



Detailed Facility Report

Facility Summary

**PILGRIM'S PRIDE PROCESSING
PLANT
949 INDUSTRIAL BLVD.,
GAINESVILLE, GA 30501**

FRS (Facility Registry Service) ID:
110000520035
EPA Region: 04
Latitude: 34.28352
Longitude: -83.82795
Locational Data Source: TRIS
Industry:
Indian Country: N

Enforcement and Compliance Summary

Statute	Insp (5 Years)	Date of Last Inspection	Compliance Status	Qtrs with NC (Noncompliance) (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	--	--	No Violation Identified	0	0	--	--	--	--	--
CWA	--	08/27/2014	No Violation Identified	0	0	1	--	--	2	\$65,850

Regulatory Information

Clean Air Act (CAA):
Operating Minor
(GA0000001313900099)
Clean Water Act (CWA):
Minor, (GAD000125), Minor, 30501CNGRP949IN
Permit Admin Continued
(GAIS00415)

Other Regulatory Reports

Air Emissions Inventory (EIS): 2610511
Greenhouse Gas Emissions (eGGRT):
No Information
Toxic Releases (TRI):

Minor, 30501CNGRP949IN

Resource Conservation and
Recovery Act (RCRA): No
Information
Safe Drinking Water Act
(SDWA): No Information

Compliance and Emissions Data
Reporting Interface (CEDRI): No
Information

Known Data Problems

Facility/System Characteristics

Facility/System Characteristics

System	Statute	Identifier	Universe	Status	Areas	Permit Expiration Date	Indian Country	Latitude	Longitude
FRS		110000520035					N	34.28352	-83.82795
RMP	CAA	100000100856		ACTIVE			N		
EIS	CAA	2610511		OPERATING			N	34.28305	-83.82805
ICIS-Air	CAA	GA0000001313900099	Minor Emissions	Operating	CAANSPS, CAARMF, CAASIP		N		
ICIS-NPDES	CWA	GAD000125	Minor: Unpermitted Facility				N	34.17	-83.4938
ICIS-NPDES	CWA	GAIS00415	Minor: General Permit Covered Facility	Admin Continued	Storm Water Industrial	05/31/2017	N	34.2833	-83.8272
TRI	EP313	30501CNGRP949IN	Toxics Release Inventory	Last Reported for 2018			N	34.28352	-83.82795

Facility Address

System	Statute	Identifier	Facility Name	Facility Address
FRS		110000520035	PILGRIM'S PRIDE PROCESSING PLANT	949 INDUSTRIAL BLVD., GAINESVILLE, GA 30501
RMP	CAA	100000100856	PILGRIM'S PRIDE - GAINESVILLE POULTRY PROCESSING	949 INDUSTRIAL BLVD., GAINESVILLE, GA 30503
EIS	CAA	2610511	PILGRIM'S PRIDE PROCESSING PLANT	949 INDUSTRIAL BLVD., GAINESVILLE, GA 30501
ICIS-Air	CAA	GA0000001313900099	PILGRIM'S PRIDE CORPORATION	949 INDUSTRIAL BOULEVARD, GAINESVILLE, GA 30503
ICIS-NPDES	CWA	GAD000125	PILGRIM'S PRIDE CORPORATION	949 INDUSTRIAL BLVD, GAINESVILLE, GA 30501
ICIS-NPDES	CWA	GAIS00415	PILGRIM'S PRIDE - GAINESVILLE PROCESSING PLANT	949 INDUSTRIAL BLVD., GAINESVILLE, GA 30501
TRI	EP313	30501CNGRP949IN	PILGRIM'S PRIDE GAINESVILLE PROCESSING PLANT	949 INDUSTRIAL BLVD., GAINESVILLE, GA 30501

Facility SIC (Standard Industrial Classification) Codes

System	Identifier	SIC Code	SIC Description
TRI	30501CNGRP949IN	2015	Poultry Slaughtering And Processing
TRI	30501CNGRP949IN	2016	Legacy Docket Conv
ICIS-Air	GA0000001313900099	2013	Sausages And Other Prepared Meats
ICIS-NPDES	GAIS00415	2015	Poultry Slaughtering And Processing

Facility NAICS (North American Industry Classification System) Codes

System	Identifier	NAICS Code	NAICS Description
RMP	100000100856	311615	Poultry Processing
EIS	2610511	311615	Poultry Processing
TRI	30501CNGRP949IN	311615	Poultry Processing
ICIS-Air	GA0000001313900099	311613	Rendering and Meat Byproduct Processing

Facility Industrial Effluent Guidelines

Facility Tribe Information

Identifier Effluent Guideline (40 CFR Part) Effluent Guideline Description

No data records returned

Reservation Name Tribe Name EPA Tribal ID Distance to Tribe (miles)

No data records returned

Enforcement and Compliance**Compliance Monitoring History (5 years)**

Statute	Source ID	System	Activity Type	Compliance Monitoring Type	Lead Agency	Date	Finding (if applicable)
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	07/12/2019	
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	01/25/2019	
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	07/13/2018	
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	01/31/2018	
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	07/17/2017	
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	01/17/2017	
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	07/22/2016	
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	02/01/2016	
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	07/27/2015	
CAA	GA0000001313900099	ICIS-Air	Inspection/Evaluation	PCE Off-Site	State	01/29/2015	

Entries in italics are not counted in EPA compliance monitoring strategies or annual results.

Compliance Summary Data

Statute	Source ID	Current SNC (Significant Noncompliance)/HPV (High Priority Violation)	Current As Of	Qtrs with NC (Noncompliance) (of 12)	Data Last Refreshed
CAA	GA0000001313900099	No	10/26/2019	0	10/25/2019
CWA	GAD000125	No	06/30/2019	0	10/25/2019
CWA	GAIS00415	No	06/30/2019	0	10/25/2019

Three-Year Compliance History by Quarter

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12+
CAA (Source ID: GA0000001313900099)		01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18	07/01-09/30/18	10/01-12/31/18	01/01-03/31/19	04/01-06/30/19	07/01-09/30/19	10/01-12/31/19
	Facility-Level Status	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified
	HPV History												
	Violation Type	Agency	Programs	Pollutants									
CWA (Source ID: GAD000125)		07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18	07/01-09/30/18	10/01-12/31/18	01/01-03/31/19	04/01-06/30/19
	Facility-Level Status	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Quarterly Noncompliance Report History												
CWA (Source ID: GAIS00415)		07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18	07/01-09/30/18	10/01-12/31/18	01/01-03/31/19	04/01-06/30/19
	Facility-Level Status	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Quarterly Noncompliance Report History												

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13+
	Facility-Level Status	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	Undetermined
	Quarterly Noncompliance Report History													

Informal Enforcement Actions (5 Years)

Statute	System	Source ID	Type of Action	Lead Agency	Date
CWA	ICIS-NPDES	GAD000125	Notice of Violation	EPA	01/28/2015

Formal Enforcement Actions (5 Years)

Statute	System	Law/Section	Source ID	Action Type	Case No.	Lead Agency	Case Name	Issued/Filed Date	Settlements/Actions	Settlement/Action Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
CWA	ICIS-NPDES	301/402	NPDES/GAD000125	Administrative - Formal	04-2016-4501	EPA	PILGRIMS PRIDE CORPORATION	05/19/2016	1	05/19/2016	\$65,850	\$0	\$0	\$0
CWA	ICIS-NPDES	301/402	NPDES/GAD000125	Administrative - Formal	04-2016-4752	EPA	PILGRIMS PRIDE CORPORATION	11/19/2015	1	11/19/2015	\$0	\$0	\$0	\$8,000

Environmental Conditions

Water Quality

Permit ID	Combined Sewer System?	Number of CSO (Combined Sewer Overflow) Outfalls	12-Digit WBD (Watershed Boundary Dataset) IUUC (RAD (Reach Address Database))	WBD (Watershed Boundary Dataset) Subwatershed Name (RAD (Reach Address Database))	State Water Body Name (ICIS (Integrated Compliance Information System))	Impaired Waters	Impaired Class	Causes of Impairment(s) by Group(s)	Watershed with ESA (Endangered Species Act)-listed Aquatic Species?
GAD000125			030701010406	Parks Creek-North Oconee River		No	4A	PATHOGENS	Yes
GAIS00415			031300010802	Flat Creek		No	4A	CAUSE UNKNOWN - IMPAIRED BIOTA PATHOGENS	Yes

Water Body Designated Uses

Reach Code	Water Body Name	Exceptional Use	Recreational Use	Aquatic Life Use	Shellfish Use	Beach Closure Within Last Year	Beach Closure Within Last Two Years
03070101000087	North Oconee River	No	No	No	No	No	No
03130001001308	Flat Creek	No	No	No	No	No	No

Air Quality

Nonattainment Area?	Pollutant(s)	Applicable Nonattainment Standard(s)
Yes	Ozone	8-Hour Ozone (1997)
No	Lead	
Yes	Particulate Matter	PM-2.5 (1997)
No	Carbon Monoxide	
No	Nitrogen Dioxide	
No	Sulfur Dioxide	

Pollutants

Toxics Release Inventory History of Reported Chemicals Released in Pounds per Year at Site

		<u>Air Pollutant Report</u>			<u>TRI Pollution Prevention Report</u>			
TRI Facility ID	Year	Total Air Emissions	Surface Water Discharges	Off-Site Transfers to POTWs (Publicly Owned Treatment Works)	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers
30501CNGR1940N	2018	672		0		0	672	
30501CNGR1940N	2017	494		0		0	494	
30501CNGR1940N	2016	0		7,926		7,926	7,926	7,926
30501CNGR1940N	2015	10,909	16	4,177			10,925	4,177
30501CNGR1940N	2010	19,200	4	3,900			19,204	3,932
30501CNGR1940N	2009	13,501	18	4,555			13,519	4,585

Toxics Release Inventory Total Releases and Transfers in Pounds by Chemical and Year

Chemical Name	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009
AMMONIA				15,102					23,136	18,104
COPPER COMPOUNDS										
MANGANESE COMPOUNDS										
OZONE										
PERACETIC ACID	672	494	15,851							
SODIUM HYDROXIDE (SOLUTION)										
ZINC COMPOUNDS										

Demographic Profile

EJSCREEN EJ Indexes

Eleven primary environmental justice (EJ) indexes of EJSCREEN, EPA's screening tool for EJ concerns. EPA uses these indexes to identify geographic areas that may warrant further consideration or analysis for potential EJ concerns. Note that use of these indexes does not designate an area as an "EJ community" or "EJ facility." EJSCREEN provides screening level indicators, not a determination of the existence or absence of EJ concerns. For more information, see the [EJSCREEN home page](#).

Census Block Group EJ Indexes (percentile)

Particulate Matter (PM 2.5)	94.7
Ozone NATA Diesel PM	93.9
NATA Air Toxics Cancer Risk	96.8
NATA Respiratory Hazard Index (HI)	94.9
Traffic Proximity	95.8
Lead Paint Indicator	88.5
Superfund Proximity	71.9
Risk Management Plan (RMP) Proximity	99.9

Number of EJ Indexes Above 80th Percentile

10

[View EJSCREEN Report](#)

Census Block Group EJ Indexes (percentile)

Hazardous Waste Proximity	86.2
Wastewater Discharge Proximity	95

Demographic Profile of Surrounding Area (3 Miles)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2010 US Census and American Community Survey data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table (LRT) when available.

General Statistics

Total Persons	39,825
Population Density	1,448/sq. mi.
Percent Minority	72%
Households in Area	11,820
Housing Units in Area	13,518
Households on Public Assistance	183
Persons Below Poverty Level	21,173

Geography

Radius of Selected Area	3 mi
Center Latitude	34.28352
Center Longitude	-83.82795
Land Area	97%
Water Area	3%

Income Breakdown - Households (%)

Less than \$15,000	2,094 (17.28%)
\$15,000 - \$25,000	2,114 (17.45%)
\$25,000 - \$50,000	3,924 (32.38%)
\$50,000 - \$75,000	1,847 (15.24%)
Greater than \$75,000	2,139 (17.65%)

Age Breakdown - Persons (%)

Children 5 years and younger	4,188 (11%)
Minors 17 years and younger	12,614 (32%)
Adults 18 years and older	27,211 (68%)
Seniors 65 years and older	3,381 (8%)

Race Breakdown - Persons (%)

White	18,323 (46%)
African-American	5,905 (15%)
Hispanic-Origin	21,748 (55%)
Asian/Pacific Islander	1,011 (3%)
American Indian	291 (1%)
Other/Multiracial	14,295 (36%)

Education Level (Persons 25 & older) - Persons (%)

Less than 9th Grade	5,390 (25.73%)
9th through 12th Grade	3,182 (15.19%)
High School Diploma	6,086 (29.05%)
Some College/2-year	3,424 (16.34%)
B.S./B.A. (Bachelor of Science/Bachelor of Arts) or More	2,868 (13.69%)



Detailed Facility Report

Facility Summary

**MAR-JAC POULTRY INC-
GAINESVILLE PLANT
1020 AVIATION BLVD,
GAINESVILLE, GA 30501**

FRS (Facility Registry Service) ID:
110064550659
EPA Region: 04
Latitude: 34.27869
Longitude: -83.82853
Locational Data Source: FRS
Industry:
Indian Country: N

Enforcement and Compliance Summary

Statute	Insp (5 Years)	Date of Last Inspection	Compliance Status	Qtrs with NC (Noncompliance) (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	--	--	--	--	--	--	--	--	--	--
CWA	1	07/18/2018	Unknown	4	0	1	--	--	2	\$44,230

Regulatory Information

Clean Air Act (CAA): No Information

Clean Water Act (CWA): Minor, (GAD000124), Minor, No Information

Permit Effective; Compliance Tracking Partially Off (GAIS03266)

Resource Conservation and

Other Regulatory Reports

Air Emissions Inventory (EIS): No Information

Greenhouse Gas Emissions (eGGRT):

No Information

Toxic Releases (TRI): 3050WMRJCP12AVI

Recovery Act (RCRA): No Information
 Safe Drinking Water Act (SDWA): No Information
 Compliance and Emissions Data Reporting Interface (CEDRI): No Information

Known Data Problems

Facility/System Characteristics

Facility/System Characteristics

System	Statute	Identifier	Universe	Status	Areas	Permit Expiration Date	Indian Country	Latitude	Longitude
FRS		110064550659					N	34.27869	-83.82853
RMP	CAA	10000056681		ACTIVE			N		
ICIS-NPDES	CWA	GAD000124	Minor: Unpermitted Facility				N	34.278611	-83.829444
ICIS-NPDES	CWA	GAIS03266	Minor: General Permit Covered Facility	Effective, Compliance Tracking Partially Off	Storm Water Industrial	05/31/2022	N	34.2794	-83.8289
TRI	EP313	3050WMRJCP12AVI	Toxics Release Inventory	Last Reported for 2018			N	34.27869	-83.82853

Facility Address

System	Statute	Identifier	Facility Name	Facility Address
FRS		110064550659	MAR-JAC POULTRY INC-GAINESVILLE PLANT	1020 AVIATION BLVD, GAINESVILLE, GA 30501
RMP	CAA	10000056681	MAR-JAC POULTRY, INC.	1020 AVIATION BLVD, GAINESVILLE, GA 30503
ICIS-NPDES	CWA	GAD000124	MAR-JAC POULTRY, INC.	1020 AVIATION BLVD, GAINESVILLE, GA 30317
ICIS-NPDES	CWA	GAIS03266	MARJAC POULTRY, INC.	1020 AVIATION BLVD, GAINESVILLE, GA 30501
TRI	EP313	3050WMRJCP12AVI	MAR-JAC POULTRY INC-GAINESVILLE PLANT	1020 AVIATION BLVD, GAINESVILLE, GA 30501

Facility SIC (Standard Industrial Classification) Codes

System	Identifier	SIC Code	SIC Description
ICIS-NPDES	GAIS03266	2015	Poultry Slaughtering And Processing
ICIS-NPDES	GAIS03266	4212	Local Trucking, Without Storage

Facility NAICS (North American Industry Classification System) Codes

System	Identifier	NAICS Code	NAICS Description
RMP	10000056681	311615	Poultry Processing
RMP	10000056681	49312	Refrigerated Warehousing and Storage
TRI	3050WMRJCP12AVI	311615	Poultry Processing

Facility Industrial Effluent Guidelines

Identifier	Effluent Guideline (40 CFR Part)	Effluent Guideline Description
		No data records returned

Facility Tribe Information

Reservation Name	Tribe Name	EPA Tribal ID	Distance to Tribe (miles)
			No data records returned

Enforcement and Compliance

Compliance Monitoring History (5 years)

Statute	Source ID	System	Activity Type	Compliance Monitoring Type	Lead Agency	Date	Finding (if applicable)
CWA	GAIS03266	ICIS-NPDES	Inspection/Evaluation	Audit	State	07/18/2018	

Entries in italics are not counted in EPA compliance monitoring strategies or annual results.

Compliance Summary Data

Statute	Source ID	Current SNC (Significant Noncompliance)/HPV (High Priority Violation)	Current As Of	Qtrs with NC (Noncompliance) (of 12)	Data Last Refreshed
CWA	GAD000124	No	06/30/2019	0	10/18/2019
CWA	GAIS03266	No	06/30/2019	4	10/18/2019

Three-Year Compliance History by Quarter

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12	QTR 13+
CWA (Source ID: GAD000124)		07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18	07/01-09/30/18	10/01-12/31/18	01/01-03/31/19	04/01-06/30/19	07/01-10/18/19
	Facility-Level Status	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
	Quarterly Noncompliance Report History													
CWA (Source ID: GAIS03266)		07/01-09/30/16	10/01-12/31/16	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18	07/01-09/30/18	10/01-12/31/18	01/01-03/31/19	04/01-06/30/19	07/01-10/18/19
	Facility-Level Status	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	Violation Identified	Violation Identified	Violation Identified	Violation Identified	Unknown	Unknown	Undetermined
	Quarterly Noncompliance Report History							Reportable Noncompliance	Reportable Noncompliance	Reportable Noncompliance	Reportable Noncompliance	Undetermined	Undetermined	

Informal Enforcement Actions (5 Years)

Statute	System	Source ID	Type of Action	Lead Agency	Date
CWA	ICIS-NPDES	GAD000124	Notice of Violation	EPA	02/10/2015

Formal Enforcement Actions (5 Years)

Statute	System	Law/Section	Source ID	Action Type	Case No.	Lead Agency	Case Name	Issued/Filed Date	Settlements/Actions	Settlement/Action Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
CWA	ICIS-NPDES	301/402	NPDES/GAD000124	Administrative - Formal	04-2016-4504	EPA	MAR-JAC POULTRY, INC.	10/27/2016	1	10/27/2016	\$44,230	\$0	\$0	\$0
CWA	ICIS-NPDES	301/402	NPDES/GAD000124	Administrative - Formal	04-2015-4775	EPA	MAR-JAC POULTRY, INC.	09/30/2015	1	09/30/2015	\$0	\$0	\$0	\$10,000

Environmental Conditions

Water Quality

Permit ID	Combined Sewer System?	Number of CSO (Combined Sewer Overflow) Outfalls	12-Digit WBD (Watershed Boundary Dataset) HUC (RAD (Reach Address Database))	WBD (Watershed Boundary Dataset) Subwatershed Name (RAD (Reach Address Database))	State Water Body Name (ICIS (Integrated Compliance Information System))	Impaired Waters	Impaired Class	Causes of Impairment(s) by Group(s)	Watershed with ESA (Endangered Species Act)-listed Aquatic Species?
GAD000124			031300010802	Flat Creek		No	4A	CAUSE UNKNOWN - IMPAIRED BIOTA PATHOGENS	Yes
GAISO3266			031300010802	Flat Creek		No	4A	CAUSE UNKNOWN - IMPAIRED BIOTA PATHOGENS	Yes

Water Body Designated Uses

Reach Code	Water Body Name	Exceptional Use	Recreational Use	Aquatic Life Use	Shellfish Use	Beach Closure Within Last Year	Beach Closure Within Last Two Years
03130001001308	Flat Creek	No	No	No	No	No	No
03130001001308	Flat Creek	No	No	No	No	No	No

Air Quality

Nonattainment Area?	Pollutant(s)	Applicable Nonattainment Standard(s)
Yes	Ozone	8-Hour Ozone (1997)
No	Lead	
Yes	Particulate Matter	PM-2.5 (1997)
No	Carbon Monoxide	
No	Nitrogen Dioxide	
No	Sulfur Dioxide	

Pollutants

Toxics Release Inventory History of Reported Chemicals Released in Pounds per Year at Site

TRI Pollution Prevention Report

TRI Facility ID	Year	Total Air Emissions	Surface Water Discharges	Off-Site Transfers to POTWs (Publicly Owned Treatment Works)	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers
3050WMRCP12AV1	2018			0			0	0
3050WMRCP12AV1	2017			0			0	
3050WMRCP12AV1	2016			0			0	
3050WMRCP12AV1	2015			0			0	
3050WMRCP12AV1	2014			0			0	

Toxics Release Inventory Total Releases and Transfers in Pounds by Chemical and Year

Chemical Name	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009
PERACETIC ACID	0									

Demographic Profile

EJSCREEN EJ Indexes

Eleven primary environmental justice (EJ) indexes of EJSCREEN, EPA's screening tool for EJ concerns. EPA uses these indexes to identify geographic areas that may warrant further consideration or analysis for potential EJ concerns. Note that use of these indexes does not designate an area as an "EJ community" or "EJ facility." EJSCREEN provides screening level indicators, not a determination of the existence or absence of EJ concerns. For more information, see the [EJSCREEN home page](#).

Census Block Group EJ Indexes (percentile)	Number of EJ Indexes Above 80th Percentile
Particulate Matter (PM 2.5)	79.4
Ozone NATA Diesel PM	77.9
NATA Air Toxics Cancer Risk	78.7
NATA Respiratory Hazard Index (HI)	74.8
Traffic Proximity	80.8
Lead Paint Indicator	85.7
Superfund Proximity	62.4
Risk Management Plan (RMP) Proximity	93.1
Hazardous Waste Proximity	80.9
Wastewater Discharge Proximity	89.3

[View EJSCREEN Report](#)

Demographic Profile of Surrounding Area (3 Miles)

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2010 US Census and American Community Survey data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table (LRT) when available.

General Statistics		Age Breakdown - Persons (%)	
Total Persons	38,738	Children 5 years and younger	4,045 (10%)
Population Density	1,407/sq mi	Minors 17 years and younger	12,157 (31%)
Percent Minority	74%	Adults 18 years and older	26,581 (69%)
Households in Area	11,103	Seniors 65 years and older	3,053 (8%)
Housing Units in Area	12,691	Race Breakdown - Persons (%)	
Households on Public Assistance	151	White	17,555 (45%)
Persons Below Poverty Level	20,265	African-American	5,923 (15%)
Geography		Hispanic-Origin	21,498 (56%)
Radius of Selected Area	3 mi	Asian/Pacific Islander	1,018 (3%)
Center Latitude	34.27869	American Indian	286 (1%)
Center Longitude	-83.82853	Other/Multiracial	13,957 (36%)
Land Area	98%	Education Level (Persons 25 & older) - Persons (%)	
Water Area	2%	Less than 9th Grade	5,360 (26.2%)
Income Breakdown - Households (%)		9th through 12th Grade	3,207 (15.68%)
Less than \$15,000	1,949 (16.95%)	High School Diploma	6,070 (29.67%)
\$15,000 - \$25,000	1,996 (17.36%)	Some College/2-year	3,260 (15.94%)
\$25,000 - \$50,000	3,775 (32.82%)	B.S./B.A. (Bachelor of Science/Bachelor of Arts) or More	2,560 (12.51%)
\$50,000 - \$75,000	1,790 (15.56%)		

Income Breakdown - Households (%)

Greater than \$75,000 1,991 (17.31%)



Detailed Facility Report

Facility Summary

COLUMBIA FARMS WEST
COLUMBIA
338 SUNSET BLVD, WEST
COLUMBIA, SC 29169

FRS (Facility Registry Service) ID:
 110001673225
 EPA Region: 04
 Latitude: 33.995836
 Longitude: -81.057036
 Locational Data Source: FRS
 Industry:
 Indian Country: N

Enforcement and Compliance Summary

Statute	Insp (5 Years)	Date of Last Inspection	Compliance Status	Qtrs with NC (Noncompliance) (of 12)	Qtrs with Significant Violation	Informal Enforcement Actions (5 years)	Formal Enforcement Actions (5 years)	Penalties from Formal Enforcement Actions (5 years)	EPA Cases (5 years)	Penalties from EPA Cases (5 years)
CAA	--	--	No Violation Identified	0	0	--	--	--	--	--

Regulatory Information

Clean Air Act (CAA):
 Operating Minor
 (SC00015600121)
 Clean Water Act (CWA): No
 Information
 Resource Conservation and
 Recovery Act (RCRA): No

Other Regulatory Reports

Air Emissions Inventory (EIS): 3793611
 Greenhouse Gas Emissions (eGGRT):
 No Information
 Toxic Releases (TRI):
 29169CLMBF338SU
 Compliance and Emissions Data
 Reporting Interface (CEDRI): No
 Information

Information
Safe Drinking Water Act
(SDWA): No Information

Known Data Problems

Facility/System Characteristics

Facility/System Characteristics

System	Statute	Identifier	Universe	Status	Area	Permit Expiration Date	Indian Country	Latitude	Longitude
FRS		110001673225					N	33.995836	-81.057036
EIS	CAA	3793611		OPERATING			N	33.996564	-81.060985
ICIS-Air	CAA	SC00015600121	Minor Emissions	Operating	CAASIP		N		
TRI	EP313	29169CLMBF338SU	Toxics Release Inventory	Last Reported for 2018			N	33.996371	-81.05795

Facility Address

System	Statute	Identifier	Facility Name	Facility Address
FRS		110001673225	COLUMBIA FARMS WEST COLUMBIA	338 SUNSET BLVD, WEST COLUMBIA, SC 29169
EIS	CAA	3793611	COLUMBIA FARMS SUNSET BLVD	338 SUNSET BLVD, WEST COLUMBIA, SC 29169
ICIS-Air	CAA	SC00015600121	COLUMBIA FARMS WEST COLUMBIA	338 SUNSET BLVD, WEST COLUMBIA, SC 29169
TRI	EP313	29169CLMBF338SU	COLUMBIA FARMS/HOUSE OF RAEFORD	410 SUNSET BLVD, WEST COLUMBIA, SC 29169

Facility SIC (Standard Industrial Classification) Codes

System	Identifier	SIC Code	SIC Description
ICIS-Air	SC00015600121	2015	Poultry Slaughtering And Processing

Facility NAICS (North American Industry Classification System) Codes

System	Identifier	NAICS Code	NAICS Description
TRI	29169CLMBF338SU	311615	Poultry Processing
EIS	3793611	311615	Poultry Processing
ICIS-Air	SC00015600121	311615	Poultry Processing

Facility Tribe Information

Reservation Name	Tribe Name	EPA Tribal ID	Distance to Tribe (miles)
No data records returned			

Enforcement and Compliance

Compliance Monitoring History (5 years)

Statute	Source ID	System	Activity Type	Compliance Monitoring Type	Lead Agency	Date	Finding (if applicable)
No data records returned							

Entries in italics are not counted in EPA compliance monitoring strategies or annual results.

Compliance Summary Data

Statute	Source ID	Current SNC (Significant Noncompliance)/HPV (High Priority Violation)	Current As Of	Qtrs with NC (Noncompliance) (of 12)	Data Last Refreshed
CAA	SC00015600121	No	10/26/2019	0	10/25/2019

Three-Year Compliance History by Quarter

Statute	Program/Pollutant/Violation Type	QTR 1	QTR 2	QTR 3	QTR 4	QTR 5	QTR 6	QTR 7	QTR 8	QTR 9	QTR 10	QTR 11	QTR 12+
CAA	(Source ID: SC00015600121)	01/01-03/31/17	04/01-06/30/17	07/01-09/30/17	10/01-12/31/17	01/01-03/31/18	04/01-06/30/18	07/01-09/30/18	10/01-12/31/18	01/01-03/31/19	04/01-06/30/19	07/01-09/30/19	10/01-12/31/19
Facility-Level Status		No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified	No Violation Identified
HPV History													
Violation Type	Agency	Programs	Pollutants										

Informal Enforcement Actions (5 Years)

Statute	System	Source ID	Type of Action	Lead Agency	Date
No data records returned					

Formal Enforcement Actions (5 Years)

Statute	System	Law/Section	Source ID	Action Type	Case No.	Lead Agency	Case Name	Issued/Filed Date	Settlements/Actions	Settlement/Action Date	Federal Penalty	State/Local Penalty	SEP Cost	Comp Action Cost
No data records returned														

Environmental Conditions

Water Quality

Permit ID	Combined Sewer System?	Number of CSO (Combined Sewer Overflow) Outfalls	12-Digit WBD (Watershed Boundary Dataset) HUC (RAD (Reach Address Database))	WBD (Watershed Boundary Dataset) Subwatershed Name (RAD (Reach Address Database))	State Water Body Name (ICIS (Integrated Compliance Information System))	Impaired Waters	Impaired Class	Causes of Impairment(s) by Group(s)	Watershed with ESA (Endangered Species Act)-listed Aquatic Species?
No data records returned									

Water Body Designated Uses

Reach Code	Water Body Name	Exceptional Use	Recreational Use	Aquatic Life Use	Shellfish Use	Beach Closure Within Last Year	Beach Closure Within Last Two Years
No data records returned							

Air Quality

Nonattainment Area?	Pollutant(s)	Applicable Nonattainment Standard(s)
---------------------	--------------	--------------------------------------

Nonattainment Area?	Pollutant(s)	Applicable Nonattainment Standard(s)
No	Ozone	
No	Lead	
No	Particulate Matter	
No	Carbon Monoxide	
No	Nitrogen Dioxide	
No	Sulfur Dioxide	

Pollutants

Toxics Release Inventory History of Reported Chemicals Released in Pounds per Year at Site

TRI Facility ID	Year	Air Pollutant Report				TRI Pollution Prevention Report		
		Total Air Emissions	Surface Water Discharges	Off-Site Transfers to POTWs (Publicly Owned Treatment Works)	Underground Injections	Releases to Land	Total On-site Releases	Total Off-site Transfers
29169CLMHE338SL	2018	489		8,303			489	8,303
29169CLMHE338SL	2017	489		8,242			489	8,242
29169CLMHE338SL	2016	489		7,447			489	7,447
29169CLMHE338SL	2015	489		7,875			489	7,875
29169CLMHE338SL	2014	489		1,736			489	1,736
29169CLMHE338SL	2013	489		1,760			489	1,760
29169CLMHE338SL	2012	489		1,369			489	1,369
29169CLMHE338SL	2011	489		1,384			489	1,384
29169CLMHE338SL	2010	489		1,248			489	1,248
29169CLMHE338SL	2009	489		1,248			489	1,248

Toxics Release Inventory Total Releases and Transfers in Pounds by Chemical and Year

Chemical Name	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009
PERACETIC ACID	8,792	8,731	7,936	8,364	2,225	2,249	1,858	1,873	1,737	1,737

Demographic Profile

EJSCREEN EJ Indexes

Eleven primary environmental justice (EJ) indexes of EJSCREEN, EPA's screening tool for EJ concerns. EPA uses these indexes to identify geographic areas that may warrant further consideration or analysis for potential EJ concerns. Note that use of these indexes does not designate an area as an "EJ community" or "EJ facility." EJSCREEN provides screening level indicators, not a determination of the existence or absence of EJ concerns. For more information, see the [EJSCREEN home page](#).

Census Block Group EJ Indexes (percentile)	Number of EJ Indexes Above 80th Percentile	
Particulate Matter (PM 2.5)	42.4	0

Census Block Group EJ Indexes (percentile)

Ozone NATA Diesel PM	46.5
NATA Air Toxics Cancer Risk	34.9
NATA Respiratory Hazard Index (HI)	31.7
Traffic Proximity	28.1
Lead Paint Indicator	24.6
Superfund Proximity	32.9
Risk Management Plan (RMP) Proximity	8.5
Hazardous Waste Proximity	16
Wastewater Discharge Proximity	3.9

[View EJSCREEN Report](#)**Demographic Profile of Surrounding Area (3 Miles)**

This section provides demographic information regarding the community surrounding the facility. ECHO compliance data alone are not sufficient to determine whether violations at a particular facility had negative impacts on public health or the environment. Statistics are based upon the 2010 US Census and American Community Survey data, and are accurate to the extent that the facility latitude and longitude listed below are correct. The latitude and longitude are obtained from the EPA Locational Reference Table (LRT) when available.

General Statistics

Total Persons	66,116
Population Density	2,447/sq mi
Percent Minority	43%
Households in Area	26,992
Housing Units in Area	31,257
Households on Public Assistance	524
Persons Below Poverty Level	27,896

Geography

Radius of Selected Area	3 mi
Center Latitude	33.995836
Center Longitude	-81.057036
Land Area	96%
Water Area	4%

Income Breakdown - Households (%)

Less than \$15,000	6,634 (23.91%)
\$15,000 - \$25,000	4,042 (14.57%)
\$25,000 - \$50,000	8,109 (29.23%)
\$50,000 - \$75,000	4,257 (15.34%)
Greater than \$75,000	4,700 (16.94%)

Age Breakdown - Persons (%)

Children 5 years and younger	3,286 (5%)
Minors 17 years and younger	8,935 (14%)
Adults 18 years and older	57,180 (86%)
Seniors 65 years and older	6,984 (11%)

Race Breakdown - Persons (%)

White	39,213 (59%)
African-American	21,548 (33%)
Hispanic-Origin	4,142 (6%)
Asian/Pacific Islander	1,629 (2%)
American Indian	266 (0%)
Other/Multiracial	3,459 (5%)

Education Level (Persons 25 & older) - Persons (%)

Less than 9th Grade	1,824 (5.05%)
9th through 12th Grade	4,464 (12.36%)
High School Diploma	8,941 (24.75%)
Some College/2-year	8,770 (24.27%)
B.S./B.A. (Bachelor of Science/Bachelor of Arts) or More	12,130 (33.57%)

LIST OF EPA-REGULATED FACILITIES IN ENVIROFACTS

Copy CSV Excel Print

Showing 1 to 1 of 1 entries

Display 10 facilities in the table

Search:

First Previous 1 Next Last

FACILITY INFORMATION	ICIS-Air	ACRES	BR	SEMS	GHG	ICIS-NPDES	RAD Info	RCRA Info	TRI	TSCA
<p>COLUMBIA FARMS WEST COLUMBIA Alternative Names for this Site: COLUMBIA FARMS/HOUSE OF RAEFORD 338 SUNSET BLVD WEST COLUMBIA, SC 29169 Latitude: 33.995836 Longitude: -81.057036</p> <p>Summary Report Facility Report Compliance Report</p>									View Report	

Showing 1 to 1 of 1 entries

Display 10 facilities in the table

Search:

First Previous 1 Next Last

Total Number of Facilities Retrieved: 1



- You are here: [EPA Home](#)
- [Envirofacts](#)
- Search Results

Search Results

- [Home](#)
- [Multisystem Search](#)
- [Topic Searches](#)
- [System Data Searches](#)
- [About the Data](#)
- [Data Downloads](#)
- [Widgets](#)
- [Services](#)
- [Mobile](#)
- [Other Datasets](#)

Envirofacts Links

[<< Return](#)

Search Parameters: Name: Containing: Raeford
City Name: West Columbia
State Abbreviation: SC

API Link for Report Data: (Copy and paste the link below to view the data from this report)

<https://data.epa.gov/efservice/multisystem/minLatitude/33.99582/>

- [Info](#)
- [AIR](#)
- [TOXICS](#)
- [WASTE](#)
- [RADIATION](#)
- [WATER](#)

*Zoom or pan map to change location.



FACILITY INFORMATION

[ICIS-Air](#) [ACRES](#) [BR](#) [SEMS](#) [GHG](#) [ICIS-NPDES](#)

Esri, HERE, Garmin, INCREM



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAR 20 2017

CERTIFIED MAIL 7016 1970 0000 8992 7189
RETURN RECEIPT REQUESTED

Mr. Dave Townsend
Vice President, Environmental
Pilgrim's Pride Corporation
949 Industrial Boulevard
Gainesville, Georgia 30501

Re: Administrative Order on Consent No. CWA 04-2016-4752
Georgia Storm Water Discharges Associated with Industrial Activity, Permit No.: GAR050000
Pilgrim's Pride Corporation, 949 Industrial Boulevard, Gainesville, Georgia 30501

Dear Mr. Townsend:

The purpose of this letter is to inform you that Pilgrim's Pride Corporation has satisfied the requirements of the above referenced Administrative Order on Consent (AOC). By copy of this letter, the AOC has been terminated. Please continue to work with the Georgia Environmental Protection Division on current permit compliance issues, and any future construction projects.

Termination of the AOC shall not be deemed an election by the U.S. Environmental Protection Agency to forego any administrative, civil or criminal action or other appropriate relief under the Clean Water Act, nor will it relieve the company of obligations to comply with any other applicable federal, state or local law.

Thank you for your cooperation in this matter. If you have any questions or problems, please contact LCDR Tara L. Houda at (404) 562-9762 or via email at Houda.Tara@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Walker".

Mary S. Walker
Director
Water Protection Division

cc: Mr. Bert Langley
Georgia Environmental Protection Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

MAY 19 2016

CERTIFIED MAIL 7015 1730 0001 8044 2968
RETURN RECEIPT REQUESTED

Mr. Dave Townsend
Vice President, Environmental
Pilgrim's Pride Corporation
949 Industrial Boulevard
Gainesville, Georgia 30501

Re: Consent Agreement and Final Order
Docket No. CWA-04-2016-4501(b)
Pilgrim's Pride, 949 Industrial Boulevard, Gainesville, Hall County, Georgia

Dear Mr. Townsend:

Enclosed please find a fully executed copy of the Consent Agreement and Final Order which has been finalized by the U.S. Environmental Protection Agency and the Regional Administrator. Please make note of the provisions under Paragraph IV. Payment.

Should you have any questions or problems, please contact LCDR Tara L. Houde at (404) 562-9762.

Sincerely,

A handwritten signature in black ink, appearing to read "James D. Giattina".

James D. Giattina
Director
Water Protection Division

Enclosure

cc: Mr. Bert Langley
Georgia Environmental Protection Division

Mr. Steven P. Case
McGrath North Mullin & Kratz, PC LLO

USFPA REGION 4
OFFICE OF THE CHIEF
CLERK
2016 MAY 19 PM 3:32
HEARING CLERK

Pilgrim's Pride Corporation
949 Industrial Boulevard
Gainesville, Hall County, Georgia

CONSENT AGREEMENT AND FINAL ORDER

DOCKET NO. CWA-04-2016-4501(b)

I. Statutory Authority

2. The authority to take action under Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), is vested in the Administrator of the United States Environmental Protection Agency. The Administrator has delegated this authority to the Regional Administrator, Region 4, who in turn has delegated this authority to the Director of the Water Protection Division of the EPA, Region 4 ("Complainant").

5. To accomplish the objective of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of

pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

6. Section 402 of the CWA, 33 U.S.C. § 1342, establishes a NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants, including stormwater, into navigable waters subject to specific terms and conditions. The EPA has granted the State of Georgia, through the Georgia Environmental Protection Division ("GAEPD"), approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

7. GAEPD issued the *Authorization to Discharge Under The National Pollutant Discharge Elimination System Stormwater Discharges Associated With Industrial Activity*, Permit No.: GAR050000 (Permit), effective June 1, 2012 ("Permit"), in accordance with the Georgia Water Quality Control Act (O.C.G.A. Code Sections 12-5-20 *et seq.*, 1964), the Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6, and the CWA. The Permit was effective June 1, 2012, and shall expire on May 31, 2017. Coverage under the Permit is obtained by submitting a Notice of Intent ("NOI") to the GAEPD.

8. On June 28, 2012, Respondent submitted a NOI to GAEPD requesting coverage under the Permit for the Facility.

9. On August 27, 2014, the EPA performed a Compliance Stormwater Evaluation Inspection ("CSWEI") at the Facility to evaluate compliance with the requirements of Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p), the regulations promulgated thereunder at 40 C.F.R. § 122.26, and the Permit. On January 28, 2015 the EPA sent a Notice of Violation (NOV) to Respondent for alleged violations of the CWA and the Permit.

10. The Permit includes the following conditions:

- a. **Permit Part 1.2.** Provides that any noncompliance with any of the requirements of this permit constitutes a violation of the Clean Water Act (CWA) and the Georgia Water Quality Control Act (WQCA). As detailed in Part 3 (Corrective Actions) of this permit, failure to take any required corrective actions constitutes an independent, additional violation of this permit, under the CWA and the WQCA.
- b. **Permit Part 1.1.4.1.** Storm water discharges that are mixed with non-storm water, other than those allowable non-storm water discharges listed in Part 1.1.3, are not eligible for coverage under this permit. Typical non-allowable non-storm water includes: (b) vehicle and equipment washwater and (f) pavement wash water from containment zones.

- c. **Permit Part 2.1.2.1. Minimize Exposure.** Permittees must minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance and fueling operations) to rain, snowmelt and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface areas is not recommended). In minimizing exposure, permittees should pay particular attention to the following: (g) perform all cleaning operations indoors, under cover or in bermed areas that prevent runoff and run-on and also that capture any overspray; and (h) ensure that all wash water drains to a proper collection system (i.e., not the storm water drainage system).
Note 1: The discharge of vehicle and equipment wash water, including tank-cleaning operations, is not authorized by this permit.
- d. **Permit Part 2.1.2.2. Good Housekeeping.** Permittees must keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.
- e. **Permit Part 3.2. Conditions Requiring Review to Determine if Modifications Are Necessary.** If any of the following conditions occur, permittees must review the selection, design, installation, and implementation of control measures 2.1.21.1 through 2.1.2.9: (b) the annual sampling result exceeds an applicable benchmark.
- f. **Permit Part 3.3. Corrective Action Deadlines.** Permittees must document the discovery of any of the conditions listed in Parts 3.1 and 3.2 within 24-hours of making such discovery. Subsequently, within 30 days of such discovery, permittees must document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination. Specific documentation required is detailed in Part 3.4. If permittees determine that changes are necessary following the review, any modifications to control measures must be made as soon as practicable following that storm event, but in no case more than ninety (90) days after the discovery, unless additional time is approved by EPD.
- g. **Permit Part 3.4.1. Corrective Action Discovery.** Within 24 hours of discovery or by the end of the next business day (see 3.3. above) of any condition listed in Parts 3.1 and 3.2, permittees must document the following information: (a) Identification of the condition triggering the need for corrective action review; (b) Description of the problem identified; and (c) Date the problem was identified.
- h. **Permit Part 3.4.1.2. Additional Documentation of Corrective Action.** (a) Corrective actions must be documented in the SWPPP; and (b) Corrective actions must be documented in the annual report.

- i. **Permit Part 4.1.1. Routine Facility Inspection Procedures.** These routine inspections must be performed by qualified personnel (for definition, see Appendix A) with at least one member of the storm water pollution prevention team participating. At least once each calendar year, the routine facility inspection must be conducted during a period when a storm water discharge is occurring.
- j. **Permit Part 4.2.1.2. Visual assessment must be made:** (b) on samples collected within the first 30 minutes of discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as possible after the first 30 minutes, and the permittee must document why it was not possible to take sample within the first 30 minutes.
- k. **Permit Part 5.1.1.2. Employee Training.** Permittees must train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Rosters of employee training or certificates of completion that include individual names and training dates must be maintained with the SWPPP or be readily available onsite.
- l. **Permit Part 5.1.2.3. Site map must provide, among other things, the following information:** a. Location and extent of significant structures and impervious surfaces.
- m. **Permit Part 6.1.7.1. Monitoring requirements in this permit begin in the first full quarter following the effective date of the permit or the permittee's date of discharge authorization, whichever comes later unless otherwise stated.**
- n. **Permit Part 8.U.7. If the benchmark is not achieved, then another round of BMPs must be implemented as provided in the general permit.**
- o. **Permit Appendix C.2.1. Applicable Benchmark Values.** The applicable benchmark values shall be the same numeric values as the instream Water Quality Standard for the pollutant(s) of concern. These benchmark values are intended to be guideline concentrations rather than numeric effluent limitations. The exceedance of a benchmark value is not a permit violation and does not in and of itself indicate a violation of instream Water Quality Standards. However, exceedance of a benchmark value may be used in conjunction with other information to demonstrate a violation of this permit or a violation of Water Quality Standard

11. As a result of the CSWEI, the EPA has determined that stormwater associated with industrial activity was discharged from the Facility within the meaning of Section 402(p) of the CWA, 33 U.S.C. § 1342(p), and its implementing regulations into Flat Creek. Flat Creek is

an impaired waterbody for fecal coliform and is the headwaters of Lake Lanier, a traditionally navigable water of the United States and a source of drinking water for much of metro Atlanta.

12. Based on the CSWEI, the NOV, and review of additional information, the EPA alleges that the Respondent has failed to comply with the CWA, its implementing regulations, and the Permit as follows

- a. Spraying live chickens with water; the water dripped off the birds, their cages, and the trucks resulting in a water sheet flowing towards stormwater inlets. This contaminated rinse water from the covered Live Holding Shed Containment Zone entered the parking lot, constituting unauthorized discharges in violation of Section 301 of the CWA 33 U.S.C. § 1311(a).
- b. Allowing blood from redwater trailers to be released on the ground and to flow away from the designated inlet structure, and storing materials uncovered outside in violation of Part 2.1.2.1 of the Permit
- c. Leaving feathers on ground near pretreatment and Live Holding Shed Containment Zone, feathers were noted behind wastewater pre-treatment sampling point, feathers were on ground outside covered holding area, and feathers and water were noted on the ground inside of and outside of Live Receiving Area. Cooling fans moved feathers and debris outside of containment zones, creating a potential for contaminating stormwater in violation of Part 2.1.2.2 of the Permit.
- d. Exceeding applicable TSS and/or fecal coliform benchmarks annually since at least 2008. Respondent has failed to review and determine if modifications were necessary for fecal coliform and TSS control measures when these benchmarks were exceeded in violation of Part 3.2 of the Permit.
- e. Respondent failed to properly document benchmark exceedance events and failed to document what if any corrective action was taken in violation of Parts 3.3 and 3.4.1. of the Permit.
- f. Failing to document corrective actions in the SWPPP or in an annual report in violation of Part 3.4.1.2 of the Permit.
- g. The logs the facility kept documenting the routine facility inspections, reviewed by the EPA, did not confirm that a member of the stormwater pollution prevention team participated in these inspections in violation of Part 4.1.1 of the Permit.
- h. The log documenting the visual assessment on samples collected does not document the time rain began or the time discharge began, therefore, it is impossible to determine based on the records whether the stormwater sample time was within the first 30 minutes of discharge. Nor is there any explanation of why

it was not possible to take sample within the first 30 minutes in violation of Part 4.2.1.2 of the Permit.

- i. There were no rosters or certificates of completion documenting that employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of the permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team were trained in violation of Part 5.1.1.2 of the Permit.
- j. Site map does not include the area across the street from the Facility that is being used by the Facility in violation of Part 5.1.2.3.a of the Permit.
- k. Monitoring for the new Permit was supposed to begin July 1, 2012. Respondent failed to collect an adequate number of samples to assess whether the fecal coliform benchmark was met for the geometric mean in May 2012-October 2012, November 2012-April 2013, May 2013-October 2013, and November 2013-December 2013 in violation of Part 6.1.7.1 of the Permit.
- l. Respondent failed to document that additional rounds of BMPs to address fecal coliform were being implemented each time a benchmark was exceeded in violation of Part 8.U.7 of the Permit.
- m. Respondent has not met benchmark values for fecal coliform (FC), the pollutant of concern in the receiving water, or TSS (a surrogate for fecal coliform) since 2008. Evaluation of fecal coliform/TSS did not occur on a regular basis. Outfall 001 failed to meet the fecal benchmark 5 of the 6 times it was sampled in 2013. There is no documentation of actions taken to address these exceedances. These continuing exceedances of the pollutant of concern without taking actions to address the problem is in violation of Part C.2.1 of the Permit.

13. Therefore, the EPA alleges that the Respondent has violated Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p), by failing to comply with the GAEPD Permit and for discharges not authorized by the Permit.

14. In November of 2015, the EPA and the Respondent finalized an Administrative Order on Consent, Docket No. CWA 04-2016-4752, pursuant to Section 309(a) of the CWA, 33 U.S., whereby the Respondent agreed to perform certain injunctive relief to address the above alleged violations.

III. Stipulations and Findings

15. Complainant and the Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order ("CA/FO") will simultaneously commence and conclude this matter.

16. For the purposes of this CA/FO, the Respondent admits the jurisdictional allegations set out above and neither admits nor denies the factual allegations set out above.

17. The Respondent hereby waives its right to contest the allegations set out above and its right to appeal the Final Order accompanying this Consent Agreement.

18. The Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CA/FO and consents to the other conditions set forth in this CA/FO.

19. By signing this CA/FO, the Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response and statement. The Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and/or imprisonment for knowing submission of such information.

20. The EPA reserves the right to assess and collect any and all civil penalties for any violation described herein and in the Administrative Order on Consent to the extent that any information or certification provided by the Respondent was materially false or inaccurate at the time such information or certification was provided to the EPA.

21. Complainant and the Respondent agree to settle this matter by their execution of this CA/FO. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of the CWA.

IV. Payment

22. Pursuant to Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), and 40 C.F.R. Part 19, and considering the nature of the violations and other relevant factors, the EPA has determined that sixty-five thousand eight hundred fifty dollars (\$65,850.00) is an appropriate civil penalty to settle this action.

23. The Respondent shall submit payment of the penalty specified in the preceding paragraph within thirty (30) days of the effective date of this CA/FO via a cashier's or certified check, payable to the order of "Treasurer, United States of America." The check shall reference

on its face the name of the Respondent and the Docket Number of this CA/FO. Such payment shall be tendered to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

24. At the time of payment, the Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CA/FO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

Mary Mattox
U.S. Environmental Protection Agency, Region 4
Water Protection Division
NPDES Permitting and Enforcement Branch
Municipal and Industrial Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

25. The penalty amount specified above shall represent civil penalties assessed by the EPA and shall not be deductible for purposes of federal taxes.

26. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), failure by the Respondent to pay the penalty assessed by the CA/FO in full by its due date may subject the Respondent to a civil action to collect the assessed penalty plus interest (at currently prevailing rates from the effective date of this CA/FO), attorney's fees, costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to twenty percent (20%) of the aggregate amount of such penalty and nonpayment penalty which are unpaid as of the beginning of such quarter. In any such collection action, the validity, amount and appropriateness of the penalty and of this CA/FO shall not be subject to review.

V. General Provisions

27. This CA/FO shall not relieve the Respondent of its obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state or local permit. Other than as expressed herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

28. Issuance of this CA/FO shall not be deemed as prohibiting, altering, or in any way limiting the ability of the EPA to pursue any other enforcement actions available to it under law. Such actions may include, without limitation, any administrative, civil, or criminal action to seek penalties, fines, injunctive, or other appropriate relief, or to initiate an action for imminent and substantial endangerment, under the CWA or any other federal or state statute, regulation, or permit.

29. Except as otherwise set forth herein, this CA/FO constitutes a settlement by Complainant and the Respondent of all claims for civil penalties pursuant to the CWA with respect to only those violations alleged in this CA/FO. Except as otherwise set forth herein, compliance with this CA/FO shall resolve the allegations of violations contained herein.

30. Nothing in this CA/FO is intended to nor shall be construed to operate in any way to resolve any criminal liability of the Respondent, or other liability resulting from violations that were not alleged in this CA/FO.

31. Each undersigned representative of the parties to this CA/FO certifies that he or she is fully authorized to enter into the terms and conditions of this CA/FO and to execute and legally bind that party to it.

32. This CA/FO applies to and is binding upon the Respondent and its officers, directors, employees, agents, successors and assigns.

33. Any change in the legal status of the Respondent, including but not limited to any transfer of assets of real or personal property, shall not alter the Respondent's responsibilities under this CA/FO.

34. Each party shall bear its own costs and attorney's fees in connection with the action resolved by this CA/FO.

35. In accordance with 40 C.F.R. § 22.5, the individuals below are authorized to receive service related to this proceeding:

For Complainant:

Wilda W. Cobb
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

For Respondent:

Steven P. Case
McGrath North
First National Tower, Suite 3700
1601 Dodge Street
Omaha, NE 68102

36. The parties acknowledge and agree that this CA/FO is subject to the requirements of 40 C.F.R. § 22.45(c)(4), which provides a right to petition to set aside a Consent Agreement and proposed Final Order based on comments received during the public comment period.

37. Pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), and 40 C.F.R. § 22.38(b), Complainant represents that the State of Georgia was provided a prior opportunity to consult with Complainant regarding this matter.

38. Effective upon signature of this CA/FO by the Respondent, the Respondent agrees that the time period commencing on the date of its signature and ending on the date the EPA receives from the Respondent the payment required by this CA/FO shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by the EPA related to the matters addressed in this CA/FO and that, in any action brought by the EPA related to the matters addressed, the Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time during such period. If the EPA gives notice to the Respondent that it will not make this CA/FO effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by the EPA.

VI. Effective Date

39. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

DOCKET NO. CWA-04-2016-4501(b)

AGREED AND CONSENTED TO:

For COMPLAINANT, U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 4:

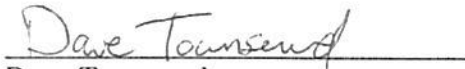

James D. Giattina

Director

Water Protection Division

Date: 5/9/16

For RESPONDENT, PILGRIM'S PRIDE CORPORATION:


Dave Townsend

VP Environmental

Date: 3/21/16

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

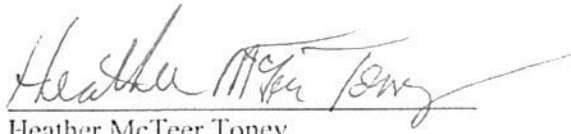
IN THE MATTER OF:)	
)	CONSENT AGREEMENT AND
Pilgrim's Pride Corporation)	FINAL ORDER
949 Industrial Boulevard)	
Gainesville, Hall County, Georgia)	
)	
RESPONDENT.)	DOCKET NO. CWA-04-2016-4501(b)
_____)	

FINAL ORDER

In accordance with the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, 40 C.F.R. Part 22, and authorities delegated to me, the foregoing Consent Agreement is hereby approved and incorporated by reference into this Final Order. Pursuant to Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), Respondent is hereby ordered to comply with the terms of the foregoing Consent Agreement.

U.S. ENVIRONMENTAL PROTECTION AGENCY

Date: MAY 19 2016


Heather McTeer Toney
Regional Administrator

Docket No. CWA 04-2016-4501(b)

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the attached **CONSENT AGREEMENT AND FINAL ORDER** in the matter of Pilgrim's Pride Corporation, Docket No. CWA-04-2016-4501(b) (filed with the Regional Hearing Clerk on 5-19, 2016) was served on 5-19, 2016, in the manner specified to each of the persons listed below.

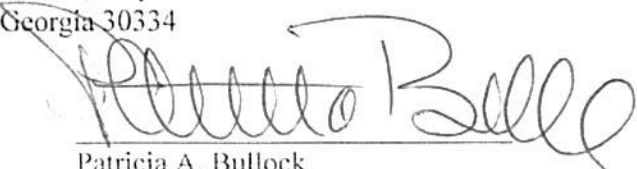
By hand-delivery:

Ms. Wilda Cobb
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

By certified mail,
return receipt requested:

Mr. Dave Townsend
VP Environmental
Pilgrim's Pride Corporation
949 Industrial Boulevard
Gainesville, Georgia 30501

Mr. Bert Langley, Director of Compliance
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1456 East, Floyd Tower
Atlanta, Georgia 30334


Patricia A. Bullock
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9511



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 19 2016

CERTIFIED MAIL 7015 1730 0002 0524 5376
RETURN RECEIPT REQUESTED

Mr. Dave Townsend
Vice President, Environmental
Pilgrim's Pride Corporation
949 Industrial Boulevard
Gainesville, Georgia 30501

Re: Consent Agreement and Final Order No. CWA-04-2016-4501(b)
Pilgrim's Pride, 949 Industrial Boulevard, Gainesville, Hall County, Georgia

Dear Mr. Townsend:

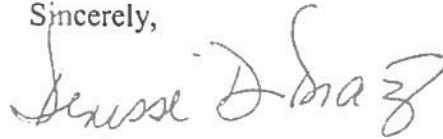
Enclosed is a Consent Agreement and Final Order (CAFO) which was prepared based on violations found at Pilgrim's Pride Corporation (PPC) in Gainesville, Georgia. Please review the enclosed CAFO, and have an authorized person for PPC sign and return it to LCDR Tara Houde of my staff within five (5) days of receipt.

After receiving the signed CAFO, the U.S. Environmental Protection Agency Region 4 must place it on public notice in accordance with 40 Code of Federal Regulations Part 22. The comment period will remain open for 30 days. This CAFO may not be finalized by the EPA until 10 days after the closure of the comment period. Once the public comment period is exhausted and the CAFO has been signed by the Water Protection Division Director, an executed copy will be sent to the Regional Administrator. Upon approval by the Regional Administrator (Final Order), the CAFO will be filed with the Regional Hearing Clerk and a copy will be mailed to you. The CAFO will become effective upon filing with the Regional Hearing Clerk.

Please note that a settlement does not relieve you of your obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state or local permit.

Should you have any further questions you may contact Ms. Houda at (404) 562-9762 or via e-mail at Houda.Tara@epa.gov. Legal inquiries should be directed to Ms. Wilda Cobb, Associate Regional Counsel, at (404) 562-9530.

Sincerely,

A handwritten signature in dark ink, appearing to read "Denisse D. Diaz". The signature is fluid and cursive, with the first name "Denisse" and last name "Diaz" clearly distinguishable.

Denisse D. Diaz, Chief
NPDES Permitting and Enforcement Branch
Water Protection Division

Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

IN THE MATTER OF:)	
)	CONSENT AGREEMENT AND
Pilgrim's Pride Corporation)	FINAL ORDER
949 Industrial Boulevard)	
Gainesville, Hall County, Georgia)	
)	
RESPONDENT.)	DOCKET NO. CWA-04-2016-4501(b)
<hr style="width:45%; margin-left:0"/>		

CONSENT AGREEMENT

I. Statutory Authority

1. This is a civil penalty proceeding pursuant to Section 309(g)(2)(B) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(g)(2)(B), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, including Subpart I, published at 64 Fed. Reg. 40176 (July 23, 1999) and codified at 40 Code of Federal Regulations ("C.F.R.") Part 22.

2. The authority to take action under Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), is vested in the Administrator of the United States Environmental Protection Agency. The Administrator has delegated this authority to the Regional Administrator, Region 4, who in turn has delegated this authority to the Director of the Water Protection Division of the EPA, Region 4 ("Complainant").

II. Allegations

3. Pilgrim's Pride Corporation ("Respondent") is a corporation duly organized and existing under the laws of the State of Georgia and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

4. At all times relevant to this action, Respondent owned and/or operated an industrial facility known as Pilgrim's Pride ("Facility") located 949 Industrial Boulevard, in Gainesville, Georgia.

5. To accomplish the objective of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of

pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

6. Section 402 of the CWA, 33 U.S.C. § 1342, establishes a NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants, including stormwater, into navigable waters subject to specific terms and conditions. The EPA has granted the State of Georgia, through the Georgia Environmental Protection Division ("GAEPD"), approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

7. GAEPD issued the *Authorization to Discharge Under The National Pollutant Discharge Elimination System Stormwater Discharges Associated With Industrial Activity*, Permit No.: GAR050000 (Permit), effective June 1, 2012 ("Permit"), in accordance with the Georgia Water Quality Control Act (O.C.G.A. Code Sections 12-5-20 *et seq.*, 1964), the Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6, and the CWA. The Permit was effective June 1, 2012, and shall expire on May 31, 2017. Coverage under the Permit is obtained by submitting a Notice of Intent ("NOI") to the GAEPD.

8. On February 4, 2014, Respondent submitted a NOI to GAEPD requesting coverage under the Permit for the Facility.

9. On August 27, 2014, the EPA performed a Compliance Stormwater Evaluation Inspection ("CSWEI") at the Facility to evaluate compliance with the requirements of Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p), the regulations promulgated thereunder at 40 C.F.R. § 122.26, and the Permit.

10. The Permit includes the following conditions:

- a. **Permit Part 1.2.** Provides that any noncompliance with any of the requirements of this permit constitutes a violation of the Clean Water Act (CWA) and the Georgia Water Quality Control Act (WQCA). As detailed in Part 3 (Corrective Actions) of this permit, failure to take any required corrective actions constitutes an independent, additional violation of this permit, under the CWA and the WQCA.
- b. **Permit Part 1.1.4.1.** Storm water discharges that are mixed with non-storm water, other than those allowable non-storm water discharges listed in Part 1.1.3, are not eligible for coverage under this permit. Typical non-allowable non-storm water includes: (b) vehicle and equipment washwater and (f) pavement wash water from containment zones.

- c. **Permit Part 2.1.2.1. Minimize Exposure.** Permittees must minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance and fueling operations) to rain, snowmelt and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface areas is not recommended). In minimizing exposure, permittees should pay particular attention to the following: (g) perform all cleaning operations indoors, under cover or in bermed areas that prevent runoff and run-on and also that capture any overspray; and (h) ensure that all wash water drains to a proper collection system (i.e., not the storm water drainage system).
Note 1: The discharge of vehicle and equipment wash water, including tank-cleaning operations, is not authorized by this permit.
- d. **Permit Part 2.1.2.2. Good Housekeeping.** Permittees must keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.
- e. **Permit Part 3.2. Conditions Requiring Review to Determine if Modifications Are Necessary.** If any of the following conditions occur, permittees must review the selection, design, installation, and implementation of control measures 2.1.21.1 through 2.1.2.9: (b) the annual sampling result exceeds an applicable benchmark.
- f. **Permit Part 3.3. Corrective Action Deadlines.** Permittees must document the discovery of any of the conditions listed in Parts 3.1 and 3.2 within 24-hours of making such discovery. Subsequently, within 30 days of such discovery, permittees must document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination. Specific documentation required is detailed in Part 3.4. If permittees determine that changes are necessary following the review, any modifications to control measures must be made as soon as practicable following that storm event, but in no case more than ninety (90) days after the discovery, unless additional time is approved by EPD.
- g. **Permit Part 3.4.1. Corrective Action Discovery.** Within 24 hours of discovery or by the end of the next business day (see 3.3. above) of any condition listed in Parts 3.1 and 3.2, permittees must document the following information: (a) Identification of the condition triggering the need for corrective action review; (b) Description of the problem identified; and (c) Date the problem was identified.
- h. **Permit Part 3.4.1.2. Additional Documentation of Corrective Action.** (a) Corrective actions must be documented in the SWPPP; and (b) Corrective actions must be documented in the annual report.

- i. **Permit Part 4.1.1. Routine Facility Inspection Procedures.** These routine inspections must be performed by qualified personnel (for definition, see Appendix A) with at least one member of the storm water pollution prevention team participating. At least once each calendar year, the routine facility inspection must be conducted during a period when a storm water discharge is occurring.
- j. **Permit Part 4.2.1.2. Visual assessment must be made:** (b) on samples collected within the first 30 minutes of discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as possible after the first 30 minutes, and the permittee must document why it was not possible to take sample within the first 30 minutes.
- k. **Permit Part 5.1.1.2. Employee Training.** Permittees must train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Rosters of employee training or certificates of completion that include individual names and training dates must be maintained with the SWPPP or be readily available onsite.
- l. **Permit Part 5.1.2.3. Site map must provide, among other things, the following information:** a. Location and extent of significant structures and impervious surfaces.
- m. **Permit Part 6.1.7.1. Monitoring requirements in this permit begin in the first full quarter following the effective date of the permit or the permittee's date of discharge authorization, whichever comes later unless otherwise stated.**
- n. **Permit Part 8.U.7. If the benchmark is not achieved, then another round of BMPs must be implemented as provided in the general permit.**
- o. **Permit Appendix C.2.1. Applicable Benchmark Values.** The applicable benchmark values shall be the same numeric values as the instream Water Quality Standard for the pollutant(s) of concern. These benchmark values are intended to be guideline concentrations rather than numeric effluent limitations. The exceedance of a benchmark value is not a permit violation and does not in and of itself indicate a violation of instream Water Quality Standards. However, exceedance of a benchmark value may be used in conjunction with other information to demonstrate a violation of this permit or a violation of Water Quality Standard

11. As a result of the CSWEI, the EPA has determined that stormwater associated with industrial activity was discharged from the Facility within the meaning of Section 402(p) of the CWA, 33 U.S.C. § 1342(p), and its implementing regulations into Flat Creek. Flat Creek is

an impaired waterbody for fecal coliform and is the headwaters of Lake Lanier, a traditionally navigable water of the United States and a source of drinking water for much of metro Atlanta.

12. Based on the CSWEI and review of additional information, the EPA has determined that the Respondent has failed to comply with the CWA, its implementing regulations, and the Permit as follows

- a. Spraying live chickens with water; the water dripped off the birds, their cages, and the trucks resulting in a water sheet flowing towards stormwater inlets. This contaminated rinse water from the covered Live Holding Shed Containment Zone entered the parking lot, constituting unauthorized discharges in violation of Section 301 of the CWA 33 U.S.C. § 1311(a).
- b. Allowing blood from redwater trailers to be released on the ground and to flow away from the designated inlet structure, and storing materials uncovered outside in violation of Part 2.1.2.1 of the Permit
- c. Leaving feathers on ground near pretreatment and Live Holding Shed Containment Zone, feathers were noted behind wastewater pre-treatment sampling point, feathers were on ground outside covered holding area, and feathers and water were noted on the ground inside of and outside of Live Receiving Area. Cooling fans moved feathers and debris outside of containment zones, creating a potential for contaminating stormwater in violation of Part 2.1.2.2 of the Permit.
- d. Exceeding applicable TSS and/or fecal coliform benchmarks annually since at least 2008. Respondent has failed to review and determine if modifications were necessary for fecal coliform and TSS control measures when these benchmarks were exceeded in violation of Part 3.2 of the Permit.
- e. Respondent failed to properly document benchmark exceedance events and failed to document what if any corrective action was taken in violation of Parts 3.3 and 3.4.1. of the Permit.
- f. Failing to document corrective actions in the SWPPP or in an annual report in violation of Part 3.4.1.2 of the Permit.
- g. The logs the facility kept documenting the routine facility inspections, reviewed by the EPA, did not confirm that a member of the stormwater pollution prevention team participated in these inspections in violation of Part 4.1.1 of the Permit.
- h. The log documenting the visual assessment on samples collected does not document the time rain began or the time discharge began, therefore, it is impossible to determine based on the records whether the stormwater sample time was within the first 30 minutes of discharge. Nor is there any explanation of why

it was not possible to take sample within the first 30 minutes in violation of Part 4.2.1.2 of the Permit.

- i. There were no rosters or certificates of completion documenting that employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of the permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team were trained in violation of Part 5.1.1.2 of the Permit.
- j. Site map does not include the area across the street from the Facility that is being used by the Facility in violation of Part 5.1.2.3.a of the Permit.
- k. Monitoring for the new Permit was supposed to begin July 1, 2012. Respondent failed to collect an adequate number of samples to assess whether the fecal coliform benchmark was met for the geometric mean in May 2012-October 2012, November 2012-April 2013, May 2013-October 2013, and November 2013-December 2013 in violation of Part 6.1.7.1 of the Permit.
- l. Respondent failed to document that additional rounds of BMPs to address fecal coliform were being implemented each time a benchmark was exceeded in violation of Part 8.U.7 of the Permit.
- m. Respondent has not met benchmark values for fecal coliform (FC), the pollutant of concern in the receiving water, or TSS (a surrogate for fecal coliform) since 2008. Evaluation of fecal coliform/TSS did not occur on a regular basis. Outfall 001 failed to meet the fecal benchmark 5 of the 6 times it was sampled in 2013. There is no documentation of actions taken to address these exceedances. These continuing exceedances of the pollutant of concern without taking actions to address the problem is in violation of Part C.2.1 of the Permit.

13. Therefore, the Respondent has violated Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p), by failing to comply with the GAEPD Permit and for discharges not authorized by the Permit.

14. In November of 2015, the EPA and the Respondent finalized an Administrative Order on Consent, Docket No. CWA 04-2016-4752, pursuant to Section 309(a) of the CWA, 33 U.S.C., whereby the Respondent agreed to perform certain injunctive relief to address the above alleged violations.

III. Stipulations and Findings

15. Complainant and the Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order ("CA/FO") will simultaneously commence and conclude this matter.

16. For the purposes of this CA/FO, the Respondent admits the jurisdictional allegations set out above and admits the factual allegations set out above.

17. The Respondent hereby waives its right to contest the allegations set out above and its right to appeal the Final Order accompanying this Consent Agreement.

18. The Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CA/FO and consents to the other conditions set forth in this CA/FO.

19. By signing this CA/FO, the Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response and statement. The Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and/or imprisonment for knowing submission of such information.

20. The EPA reserves the right to assess and collect any and all civil penalties for any violation described herein and in the Administrative Order on Consent to the extent that any information or certification provided by the Respondent was materially false or inaccurate at the time such information or certification was provided to the EPA.

21. Complainant and the Respondent agree to settle this matter by their execution of this CA/FO. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of the CWA.

IV. Payment

22. Pursuant to Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), and 40 C.F.R. Part 19, and considering the nature of the violations and other relevant factors, the EPA has determined that sixty-five thousand eight hundred fifty dollars (\$65,850.00) is an appropriate civil penalty to settle this action.

23. The Respondent shall submit payment of the penalty specified in the preceding paragraph within thirty (30) days of the effective date of this CA/FO via a cashier's or certified check, payable to the order of "Treasurer, United States of America." The check shall reference

on its face the name of the Respondent and the Docket Number of this CA/FO. Such payment shall be tendered to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

24. At the time of payment, the Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CA/FO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

Mary Mattox
U.S. Environmental Protection Agency, Region 4
Water Protection Division
NPDES Permitting and Enforcement Branch
Municipal and Industrial Enforcement Section
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

25. The penalty amount specified above shall represent civil penalties assessed by the EPA and shall not be deductible for purposes of federal taxes.

26. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), failure by the Respondent to pay the penalty assessed by the CA/FO in full by its due date may subject the Respondent to a civil action to collect the assessed penalty plus interest (at currently prevailing rates from the effective date of this CA/FO), attorney's fees, costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to twenty percent (20%) of the aggregate amount of such penalty and nonpayment penalty which are unpaid as of the beginning of such quarter. In any such collection action, the validity, amount and appropriateness of the penalty and of this CA/FO shall not be subject to review.

V. General Provisions

27. This CA/FO shall not relieve the Respondent of its obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state or local permit. Other than as expressed herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

28. Issuance of this CA/FO shall not be deemed as prohibiting, altering, or in any way limiting the ability of the EPA to pursue any other enforcement actions available to it under law. Such actions may include, without limitation, any administrative, civil, or criminal action to seek penalties, fines, injunctive, or other appropriate relief, or to initiate an action for imminent and substantial endangerment, under the CWA or any other federal or state statute, regulation, or permit.

29. Nothing in this CA/FO shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of the Respondent's violation of this CA/FO or of the statutes and regulations upon which this CA/FO is based, or for the Respondent's violation of any federal or state statute, regulation or permit.

30. Except as otherwise set forth herein, this CA/FO constitutes a settlement by Complainant and the Respondent of all claims for civil penalties pursuant to the CWA with respect to only those violations alleged in this CA/FO. Except as otherwise set forth herein, compliance with this CA/FO shall resolve the allegations of violations contained herein.

31. Nothing in this CA/FO is intended to nor shall be construed to operate in any way to resolve any criminal liability of the Respondent, or other liability resulting from violations that were not alleged in this CA/FO. Other than as expressed herein, Complainant does not waive any right to bring an enforcement action against the Respondent for violation of any federal or state statute, regulation or permit, to initiate an action for imminent and substantial endangerment or to pursue criminal enforcement.

32. Each undersigned representative of the parties to this CA/FO certifies that he or she is fully authorized to enter into the terms and conditions of this CA/FO and to execute and legally bind that party to it.

33. This CA/FO applies to and is binding upon the Respondent and its officers, directors, employees, agents, successors and assigns.

34. Any change in the legal status of the Respondent, including but not limited to any transfer of assets of real or personal property, shall not alter the Respondent's responsibilities under this CA/FO.

35. Each party shall bear its own costs and attorney's fees in connection with the action resolved by this CA/FO.

36. In accordance with 40 C.F.R. § 22.5, the individuals below are authorized to receive service related to this proceeding:

For Complainant:

Wilda W. Cobb
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

For Respondent:

Steven P. Case
McGrath North
First National Tower, Suite 3700
1601 Dodge Street
Omaha, NE 68102

37. The parties acknowledge and agree that this CA/FO is subject to the requirements of 40 C.F.R. § 22.45(c)(4), which provides a right to petition to set aside a Consent Agreement and proposed Final Order based on comments received during the public comment period.

38. Pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), and 40 C.F.R. § 22.38(b), Complainant represents that the State of Georgia was provided a prior opportunity to consult with Complainant regarding this matter.

39. Effective upon signature of this CA/FO by the Respondent, the Respondent agrees that the time period commencing on the date of its signature and ending on the date the EPA receives from the Respondent the payment required by this CA/FO shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by the EPA related to the matters addressed in this CA/FO and that, in any action brought by the EPA related to the matters addressed, the Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time during such period. If the EPA gives notice to the Respondent that it will not make this CA/FO effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by the EPA.

VI. Effective Date

40. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

AGREED AND CONSENTED TO:

For COMPLAINANT, U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 4:

James D. Giattina
Director
Water Protection Division

Date: _____

For RESPONDENT, PILGRIM'S PRIDE CORPORATION:

Dave Townsend
VP Environmental

Date: _____

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

IN THE MATTER OF:)	
)	CONSENT AGREEMENT AND
Pilgrim's Pride Corporation)	FINAL ORDER
949 Industrial Boulevard)	
Gainesville, Hall County, Georgia)	
)	
RESPONDENT.)	DOCKET NO. CWA-04-2016-4501(b)
<hr style="width: 40%; margin-left: 0;"/>)	

FINAL ORDER

In accordance with the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, 40 C.F.R. Part 22, and authorities delegated to me, the foregoing Consent Agreement is hereby approved and incorporated by reference into this Final Order. Pursuant to Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), Respondent is hereby ordered to comply with the terms of the foregoing Consent Agreement.

U.S. ENVIRONMENTAL PROTECTION AGENCY

Date: _____

Heather McTeer Toney
Regional Administrator

Docket No. CWA 04-2016-4501(b)

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the attached **CONSENT AGREEMENT AND FINAL ORDER** in the matter of _____, Docket No. CWA-04-2016-4501(b) (filed with the Regional Hearing Clerk on _____, 2016) was served on _____, 2016, in the manner specified to each of the persons listed below.

By hand-delivery: Ms. Wilda Cobb
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

By certified mail,
return receipt requested: Mr. Dave Townsend
VP Environmental
Pilgrim's Pride Corporation
949 Industrial Boulevard
Gainesville, Georgia 30501

Mr. Bert Langley, Director of Compliance
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1456 East, Floyd Tower
Atlanta, Georgia 30334

Patricia A. Bullock
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9511



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 20 2015

CERTIFIED MAIL 7015 1730 0002 0524 5246
RETURN RECEIPT REQUESTED

Mr. Dave Townsend
VP Environmental
Pilgrim's Pride Corporation
949 Industrial Boulevard
Gainesville, Georgia 30501

Re: Administrative Order on Consent, Docket No.: CWA-04-2016-4752
Georgia Storm Water Discharges Associated with Industrial Activity, Permit No.: GAR050000
Pilgrim's Pride Corporation, 949 Industrial Boulevard, Gainesville, Georgia 30501

Dear Mr. Townsend:

Enclosed, please find an executed copy of the Administrative Order on Consent (AOC), Docket No.: CWA-04-2016-4752, pertaining to the above referenced industrial facility. Please take note of Paragraphs 38-42 of the AOC, which requires certain actions and submittals from Pilgrim's Pride Corporation.

The EPA appreciates your cooperation in this matter. If you have any questions concerning the enclosed AOC, please contact Ms. Wilda Cobb, Associate Regional Counsel, at (404) 562-9530 or via email at cobb.wilda@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Stacey Bouma", is written over a horizontal line.

Stacey Bouma, Acting Chief
NPDES Permitting and Enforcement Branch
Water Protection Division

Enclosure

cc: Mr. Bert Langley
Georgia Environmental Protection Division



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

NOV 20 2015

CERTIFIED MAIL 7015 1730 0002 0524 5253
RETURN RECEIPT REQUESTED

Mr. Bert Langley
Director of Compliance
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1456 East, Floyd Tower
Atlanta, Georgia 30334-9000

Re: Administrative Order on Consent, Docket No.: CWA-04-2016-4752
Georgia Storm Water Discharges Associated with Industrial Activity, Permit No.: GAR050000
Pilgrim's Pride Corporation, 949 Industrial Boulevard, Gainesville, Georgia 30501

Dear Mr. Langley:

Pursuant to Sections 308 and 309(a) of the Clean Water Act (CWA), 33 U.S.C. §§ 1318 and 1319(a), I have determined that the above-referenced industrial facility is in violation of Section 402(p) of the CWA, 33 U.S.C. § 1342(p). As a result, I have executed an Administrative Order on Consent (AOC), a copy of which is enclosed for your reference. The AOC is presently being served. The associated Compliance Stormwater Evaluation Inspection report was sent to your office on January 28, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Giattina", written over a horizontal line.

James D. Giattina
Director
Water Protection Division

Enclosure

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

IN THE MATTER OF:) ADMINISTRATIVE COMPLIANCE
) ORDER ON CONSENT
)
Pilgrim's Pride Corporation) DOCKET NO. CWA 04-2016-4752
949 Industrial Boulevard)
Gainesville, Hall County, Georgia)
)
Respondent.)
)

ADMINISTRATIVE COMPLIANCE ORDER ON CONSENT

I. Statutory Authority

1. Section 309(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(a), provides that, whenever the U.S. Environmental Protection Agency finds that any person is in violation of any condition or limitation which implements, *inter alia*, Sections 301 and 402 of the CWA, 33 U.S.C. §§ 1311 and 1342, the EPA may issue an order requiring such person to comply with such condition or limitation, and shall specify a time for compliance that the EPA determines to be reasonable.

2. The following Findings of Fact and Determinations of Law are made and this Administrative Compliance Order on Consent ("AOC") is issued pursuant to the authority vested in the EPA by Section 309(a) of the CWA, 33 U.S.C. § 1319(a), as amended. This authority has been delegated to the Regional Administrator of the EPA, Region 4, and further delegated by the Regional Administrator to the Director of the Water Protection Division of the EPA, Region 4.

II. The EPA's Findings of Fact and Determinations of Law

3. Respondent is a corporation duly organized and existing under the laws of the State of Georgia and is a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

4. At all times relevant to this action, Respondent owned and/or operated the Pilgrims Pride facility a poultry processing facility ("Facility"), as identified by Standard Industrial Classification (SIC) Code 2015, located at 949 Industrial Boulevard, Gainesville, Georgia, and is an "industrial user" within the meaning of Section 502(18) of the CWA, 33 U.S.C. § 1362(18).

5. To accomplish the objective of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), to restore and maintain the chemical, physical and biological integrity of the nation's waters, Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of

pollutants by any person into waters of the United States except as in compliance with a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

6. Section 402 of the CWA, 33 U.S.C. § 1342, establishes a NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants, including stormwater, into navigable waters subject to specific terms and conditions. The EPA has granted the State of Georgia, through the Georgia Environmental Protection Division ("GAEPD"), approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

7. GAEPD issued the *Authorization to Discharge Under The National Pollutant Discharge Elimination System Stormwater Discharges Associated With Industrial Activity*, Permit No.: GAR050000 (Permit) in accordance with the Georgia Water Quality Control Act ("WQCA") of 1964 (O.C.G.A. Code Sections 12-5-20 *et seq.*, 1964). The Permit became effective on June 1, 2012, and will expire on May 31, 2017.

8. The Permit is a Georgia statewide NPDES general permit governing stormwater point source discharges associated with certain industrial activities, including poultry processing.

9. On February 4, 2014, Respondent submitted a Notice of Intent ("NOI") for the Facility to acquire authorization to discharge stormwater associated with industrial activities under the Permit.

10. **Permit Part 1.2** provides that any noncompliance with any of the requirements of this permit constitutes a violation of the Clean Water Act (CWA) and the Georgia Water Quality Control Act (WQCA). As detailed in Part 3 (Corrective Actions) of this permit, failure to take any required corrective actions constitutes an independent, additional violation of this permit, under the CWA and the WQCA.

11. **Permit Part 1.1.4.1.** Storm water discharges that are mixed with non-storm water, other than those allowable non-storm water discharges listed in Part 1.1.3, are not eligible for coverage under this permit. Typical non-allowable non-storm water includes: (b) vehicle and equipment washwater and (f) pavement wash water from containment zones.

12. **Permit Part 2.1.2.1 Minimize Exposure.** Permittees must minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance and fueling operations) to rain, snowmelt and runoff by either locating these industrial materials and actives inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface areas is not recommended). In minimizing exposure, permittees should pay particular attention to the following: (g) perform all cleaning operations indoors, under cover or in bermed areas that prevent runoff and run-on and also that capture any overspray; and (h) ensure that all wash water drains to a proper collection system (i.e., not the storm water drainage system). Note 1: The

discharge of vehicle and equipment wash water, including tank-cleaning operations, is not authorized by this permit.

13. **Permit Part 2.1.2.2 Good Housekeeping.** Permittees must keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers.

14. **Permit Part 2.1.2.5 Erosion and Sediment Controls.** Permittees must stabilize exposed areas and manage runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation and the resulting discharge of pollutants.

15. **Permit Part 3.2 Conditions Requiring Review to Determine if Modifications Are Necessary.** If any of the following conditions occur, permittees must review the selection, design, installation, and implementation of control measures 2.1.21.1 through 2.1.2.9: (b) the annual sampling result exceeds an applicable benchmark.

16. **Permit Part 3.3 Corrective Action Deadlines.** Permittees must document the discovery of any of the conditions listed in Parts 3.1 and 3.2 within 24-hours of making such discovery. Subsequently, within 30 days of such discovery, permittees must document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination. Specific documentation required is detailed in Part 3.4. If permittees determine that changes are necessary following the review, any modifications to control measures must be made as soon as practicable following that storm event, but in no case more than ninety (90) days after the discovery, unless additional time is approved by EPD.

17. **Permit Part 3.4.1 Corrective Action Discovery.** Within 24 hours of discovery or by the end of the next business day (see 3.3. above) of any condition listed in Parts 3.1 and 3.2, permittees must document the following information: (a) Identification of the condition triggering the need for corrective action review; (b) Description of the problem identified; and (c) Date the problem was identified.

18. **Permit Part 3.4.1.1** Within 30 days of discovery of any condition listed in Parts 3.1 and 3.2, permittees must document the following information: (a) Summary of corrective action taken or to be taken or, for triggering events identified in Part 3.2 where permittees determine that corrective action is not necessary, the basis for their determination); (b) Date corrective action is initiated; and (c) Date corrective action is completed or expected to be completed.

19. **Permit Part 3.4.1.2 Additional Documentation of Corrective Action.** (a) Corrective actions must be documented in the SWPPP; and (b) Corrective actions must be documented in the annual report.

20. **Permit Part 4.1.1 Routine Facility Inspection Procedures.** These routine inspections must be performed by qualified personnel (for definition, see Appendix A) with at least one member of the storm water pollution prevention team participating. At least once each

calendar year, the routine facility inspection must be conducted during a period when a storm water discharge is occurring.

21. **Permit Part 4.2.1.2** Visual assessment must be made: (b) on samples collected within the first 30 minutes of discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as possible after the first 30 minutes, and the permittee must document why it was not possible to take sample within the first 30 minutes.

22. **Permit Part 4.2.2.1** Photo documentation is recommended. At a minimum, documentation of the visual assessment must include: (b) sample collection date and time, and visual assessment date and time for each sample; (c) personnel collecting the sample and performing visual assessment, and their signatures; (d) nature of the discharge (i.e., runoff or snowmelt); (f) probable sources of any observed stormwater contamination; and (g) if applicable, why it was not possible to take samples within the first 30 minutes.

23. **Permit Part 4.3. Annual Comprehensive Site Inspections.** Permittees must conduct annual comprehensive site inspections consistent with the procedures set forth at Part 4.3.1 of its Permit and must document the findings of the inspections as required by Part 4.3.2 of its Permit.

24. **Permit Part 5.1.1.2 Employee Training.** Permittees must train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team.

25. **Permit Part 5.1.2.3.** Site map must provide, among other things, the following information: a. Location and extent of significant structures and impervious surfaces.

26. **Permit Part 6.1.3.1** All required monitoring must be performed on a storm event that is greater than 0.1 inch of rainfall (measurable storm event) that results in an actual discharge from the facility that follows the preceding measurable storm event by at least 72 hours. In the case of snowmelt, the monitoring must be performed at a time when a measurable discharge occurs at the facility.

27. **Permit Part 6.1.7.1** Monitoring requirements in this permit begin in the first full quarter following the effective date of the permit or the permittee's date of discharge authorization, whichever comes later unless otherwise stated.

28. **Permit Part 8.U.7** If the benchmark is not achieved, then another round of BMPs must be implemented as provided in the general permit.

29. **Permit Appendix B.14.4 Records Contents.** Records of monitoring information shall include: (a) the date, exact place, and time of sampling; (b) the initials or the name(s) of the individual(s) who performed the sampling or measurements; (c) the date(s) analyses were initiated; (d) the date(s) the analysis were performed; (e) the initials or the name(s) of the

individual(s) who performed the analyses; (f) references and written procedures, when available, for the analytical techniques or methods used; and (g) the results of such analyses, including the bench sheets, instrument readouts, computer disks or tapes, etc., used to determine these results.

30. **Permit Appendix C.2.1 Applicable Benchmark Values.** The applicable benchmark values shall be the same numeric values as the instream Water Quality Standard for the pollutant(s) of concern. These benchmark values are intended to be guideline concentrations rather than numeric effluent limitations. The exceedance of a benchmark value is not a permit violation and does not of itself indicate a violation of instream Water Quality Standards. However, exceedance of a benchmark value may be used in conjunction with other information to demonstrate a violation of this permit or a violation of Water Quality Standards.

31. On August 27, 2014, representatives of the EPA performed a Compliance Stormwater Evaluation Inspection ("CSWEI") at the Facility to evaluate the compliance with the requirements of Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p), the regulations promulgated thereunder at 40 C.F.R. § 122.26, and the Permit.

32. On January 28, 2015 the EPA sent a Notice of Violation (NOV) to Respondent for violations of the CWA and the Permit based on observations by the EPA during the CSWEI and requested that Respondent contact the EPA to schedule a Show Cause Meeting.

33. On March 19, 2015, a Show Cause Meeting was held to discuss the alleged violations.

34. In accordance with Section 402(p) of the CWA, 33 U.S.C. § 1342(p), and its implementing regulations, the EPA has determined, based on the CSWEI, that stormwater associated with industrial activity was discharged from the Facility into Flat Creek. Flat Creek is an impaired waterbody for fecal coliform and is the headwaters of Lake Lanier, a traditionally navigable water of the United States.

35. During the CSWEI, the EPA inspectors identified the following:

A. Live chickens being sprayed with water; the water dripped off the birds, their cages, and trucks resulting in a water sheet flowing towards stormwater inlets. This contaminated rinse water from the covered Live Holding Shed Containment Zone entered the parking lot, constituting an unauthorized discharges in violation of Section 301 of the CWA.

B. Blood from redwater trailers was on the ground flowing away from the designated inlet structure, in violation of Part 2.1 of the Stormwater Permit.

C. Materials stored uncovered outside, in violation of Part 2.1.2.1 of the Permit.

D. Feathers on ground near pretreatment and Live Holding Shed Containment Zone, feathers were behind wastewater pre-treatment sampling point, feathers were on ground outside covered holding area, and feathers and water were noted on the ground inside of and outside of Live Receiving. Cooling fans moved feathers and debris outside of containment zones, creating a potential for contaminating stormwater, in violation of Part 2.1.2.2 of the Permit.

36. The following violations are determined based on the EPA's review of the documents provided by the Respondent during the CSWEI and documents from GAEPD:

A. Respondent has been exceeding applicable TSS and/or fecal coliform benchmarks annually since at least 2008. Respondent has failed to review and determine if modifications were necessary for fecal coliform and TSS control measures when these benchmarks have been exceeded, violating Part 3.2 of the Permit.

C. Respondent failed to properly document benchmark exceedance events and corrective action review, violating of Parts 3.3, 3.4.1, and 3.4.1.1 of the Permit.

D. The Quarterly logs reviewed did not have the name or signature of a participating stormwater pollution prevention team member, violating Part 4.1.1 of the Permit.

E. *Table 10A Stormwater Quality Visual Assessment Log* does not document the time rain began or the time discharge began, therefore, it is impossible to determine based on the records whether the stormwater sample time was within the first 30 minutes of discharge, violating Parts 4.2.1.2 and 4.2.2.1(b) of the Permit.

G. The 2013 Table 3 Annual Comprehensive Site Inspection Reporting Forms have not been properly completed, violating Part 4.3 of the Permit.

H. No SWPPP training log was provided for 2013, violating Part 5.1.1.2 of the Permit.

I. Site map does not include the area across the street being used by the facility, violating Part 5.1.2.3.a of the Permit.

J. Monitoring for the new Permit was supposed to begin July 1, 2012. Respondent failed to collect an adequate number of sample to assess whether the fecal coliform benchmark was met for the geometric mean in May 2012-October 2012, November 2012-April 2013, May 2013-October 2013, and November

2013-December 2013. Respondent has also failed to collect monthly samples as required by GA EPD in May 2013, July 2013, September 2013, and October 2013, violating Part 6.1.7.1 of the Permit.

K. Respondent has not conducted thorough reviews of BMPs in order to remedy the continued exceedance of benchmarks, violating Part 6.3.2.1 of the Permit.

L. Respondent has not meet benchmark values for fecal coliform (FC) or TSS (a surrogate for fecal coliform) since 2008. Evaluation of fecal coliform/TSS did not occur on a regular basis. Outfall 001 failed to meet the fecal benchmark 5 of the 6 times it was sampled in 2013. No clear documentation of actions taken to address these exceedances was made, violating Part C.2.1 of the Permit.

M. Respondent failed to document that additional rounds of BMPs to address fecal coliform were being implemented each time a benchmark was exceeded, violating Part 8.U.7 of the Permit.

37. Therefore, the EPA has determined the Respondent has violated Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p), by failing to comply with the GAEPD Permit.

III. Agreement Order on Consent

38. Based on the foregoing Findings and pursuant to the authority of Sections 308 and 309(a) of the CWA, 33 U.S.C. §§ 1318 and 1319(a), THE DIRECTOR HEREBY ORDERS AND RESPONDENT HEREBY AGREES AND CONSENTS TO THE PROVISIONS OF THE PARAGRAPHS BELOW:

- A. The SWPPP to be amended shall be Respondent's SWPPP dated March 26, 2015 and prepared by Woodruff & Howe Environmental Engineering, Inc. (WHEE). Within sixty (60) calendar days from the Effective Date of this AOC, amend the SWPPP as follows:
 - i. A discussion of fecal coliform as a potential source of pollution, and develop short-term and long-term solutions to the continued exceedance of the fecal coliform benchmark.
 - ii. A clear method for documenting first flush and how samplers know when discharge starts, routine basis (frequencies and methods) must be clearly documented in schedules for housekeeping, schedules for routine or preventative maintenance for first flush pumps or spare part inventory, pump schedule at outfall 003, pump schedule for outfall 002. Also address whether there is potential for parking lot sheet flow

to flow past the sump surrounded by hay bales and flow directly to the fence line. Submit the following documentation for EPA review within sixty (60) calendar days:

- iii. In amending the SWPPP, Respondent will respond to comments from the EPA, and will incorporate the agreed upon requirements.
- B. Submit the following documentation for EPA review within sixty (60) calendar days from the Effective Date of this AOC:
- i. The revised signed SWPPP, for EPA's review, that addresses the issues discussed in Paragraphs 36.K-M of this AOC; and
 - ii. Copy of revised BMP map addressing SWPPP revisions and the issues discussed in Paragraphs 36.I of this AOC.
- C. Within thirty (30) days of the effective date of this AOC, Respondent shall provide to EPA the documentation for corrective actions, subsequent to EPA's inspection of the Facility on August 27, 2014, taken in response to the exceedances of any of the applicable benchmarks.
- D. Within ninety (90) calendar days from the Effective Date of this AOC, Respondent shall properly install, operate and maintain the updated BMPs in accordance with the revised SWPPP and certify to the EPA that these requirements have been met.
- E. Provide to EPA, beginning with the first full month following the Effective Date of this AOC, All inspection reports (including monthly and quarterly), any associated photos, and corrective action records completed to comply with Sections 4 and 8.U.5. of the Stormwater Permit, and the SWPPP. These records should be provided to EPA within fifteen (15) calendar days of the end of each month and be provided for the first three (3) complete months following the Effective Date of this AOC.
- F. Beginning thirty (30) calendar days from the Effective Date of this AOC, within fifteen (15) calendar days of the end of each month, submit for six (6) months to the EPA the following:
- i. All sampling results obtained to comply with Section 6 and 8.U.6 of the Stormwater Permit and records verifying that samples are collected per the conditions of Section 6 of the Stormwater Permit.
 - ii. All benchmark exceedances submitted to GEPD in accordance with Sections 6.2.4 and 7.2 of the Stormwater Permit.

- G. Effective immediately upon receipt of this AOC, if, during the course of on-site inspections BMP failures are observed which have resulted in the release of pollutants into waters of the State, Respondent shall, within sixty (60) days after such inspection(s), review its SWPPP and make any necessary modifications or additions to the SWPPP and correct any BMP failures. Respondent shall also, within sixty (60) days after such inspection(s), submit to GAEPD and the EPA a summary of repeat exceedances, any proposed SWPPP modifications, and certification that BMP failures have been adequately corrected.
- H. Beginning thirty (30) calendar days from the Effective Date of this AOC, the Facility shall sample every measurable storm event, that occurs during the Facility's normal operating hours, as defined in Section 6.1.3 of the Permit that results in an actual discharge from the facility for fecal coliform benchmark monitoring. Once 4 qualifying individual grab samples have been collected for the calculation of the geometric mean for that period (May-October, November-December, January-April), sampling may resume based on the normal permit conditions and any additional state requirements. This shall be in effect until the Facility has obtained 3 periods with geometric means for the fecal coliform benchmark. If storm events and/or other sampling or analytical limitations prohibit the calculation of a geometric mean per Appendix C, Part C.2.4 of the Permit for a monitoring period, the facility shall be relieved of the responsibility for calculating a geometric mean for that monitoring period. A daily rain log shall be maintained consisting of: date, time rainfall began, time discharge began, amount of rainfall, source of rainfall data, and signature of staff member. Each sample collected, must be clearly documented, including whether or not the laboratory was able to analyze the sample. Provide to EPA, beginning with the first full month following the Effective Date of this AOC, the above records. These records should be provided to EPA within fifteen (15) calendar days of the end of each month.
- I. It is recommended that the Facility post the SWPPP online, per the provisions of Permit part 5.3.2.
- J. The dye, smoke or equivalent test, as required by the Permit, shall be conducted within 120 calendar days from the Effective Date of this AOC. Data shall be submitted to the EPA within 135 calendar days from the Effective Date of this AOC.
- K. Modifications recommended by the revised draft SWPPP (extending asphalt berm containment area at the Live Haul Trailer and Cage Storage

Area and raising the elevation of the concrete pad where the landing gear rest, to provide pitch to allow trailers to drain from the rear, in the Loaded Refrigerated Trailer Parking Area) shall be made within 120 days from the Effective Date of this AOC.

- L. Submit one quarterly Visual Assessment for each outfall for April 1, 2015 through June 30, 2015, for July 1, 2015 through September 30, 2015, and for October 1, 2015 through December 31, 2015, in accordance with Permit Part 4.2. Documentation of when the rain event began and when discharge began must be included. At least two photos of each Visual Assessment will be provided (one of the sampling location at the time of sampling and one of the sample in the clear container photographed against a white background) with date and time of photos.

39. Respondent may submit a request, in writing, for an extension of time to comply with the requirements of this AOC within seven (7) calendar days of the required completion date. Such request must include the reason(s) for the extension request and a date when compliance will be achieved. Any extension must be granted by the EPA in writing to be effective.

40. All reports, notifications, documentation, and submittals required by this AOC shall be signed by a duly authorized representative of Respondent as specified by 40 C.F.R. §§ 122.22(b)(2) and (d) and shall include the following statement:

"I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

41. All reports, notifications, documentation and submittals required by this AOC shall be sent by certified mail or its equivalent to the following addresses:

ATTN: LCDR Tara Houda
NPDES Permitting and Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

Mr. James A. Capp
ATTN: Ms. Frances Carpenter
Watershed Protection Branch
Georgia Environmental Protection Division
2 Martin Luther King Jr. Drive
Suite 1152 East
Atlanta, Georgia 30334

IV. Final Report and Termination of AOC

42. Within thirty (30) calendar days after Respondent has fully completed and implemented the actions required by Section III of this AOC, Respondent shall submit for the EPA's review and approval a final report ("Final Report") that includes a summary description of all of the actions which have been taken toward achieving compliance with this AOC.

43. If the EPA determines, after review of the Final Report, that all the requirements of this AOC have been completed and implemented in accordance with this AOC, the EPA will provide written notice to Respondent and this AOC shall be deemed terminated.

44. If the EPA determines that any requirement has not been completed and implemented in accordance with this AOC, the EPA will notify Respondent and provide a list of deficiencies. Respondent shall take action to address any such deficiencies, and provide the EPA with a supplement to its Final Report. Provided that the EPA concurs that the deficiencies have been addressed the EPA will provide written notice to the Respondent that this AOC shall be deemed terminated.

V. General Provisions

45. Respondent's compliance with this AOC does not necessarily constitute compliance with the provisions of the CWA, 33 U.S.C. § 1251 et seq., its implementing regulations, or with the Permit. Respondent shall remain solely responsible for compliance with the terms of the CWA, its implementing regulations, this AOC, and the Permit.

46. Nothing in this AOC shall constitute a waiver, suspension, or modification of the terms and conditions of the Permit, which remain in full force and effect.

47. Failure to comply with the requirements herein shall constitute a violation of this AOC and the CWA, and may subject Respondent to penalties as provided in Section 309(d) of the CWA, 33 U.S.C. § 1319(d).

48. This AOC shall not relieve Respondent of its obligation to comply with all applicable provisions of federal, state, or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any other federal, state, or local permit. Compliance with

this AOC shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

49. Issuance of this AOC shall not be deemed as prohibiting, altering, or in any way limiting the ability of the EPA to pursue any other enforcement actions available to it under law. Such actions may include, without limitation, any administrative, civil, or criminal action to seek penalties, fines, injunctive, or other appropriate relief, or to initiate an action for imminent and substantial endangerment under the CWA or any other federal or state statute, regulation, or permit.

50. The EPA reserves all rights and remedies, legal and equitable, available to enforce any violation cited in this AOC and to enforce this AOC.

51. Nothing in this AOC is intended to nor shall be construed to operate in any way to resolve any criminal liability of Respondent, or other liability resulting from violations that were not alleged in this AOC.

52. This AOC applies to and is binding upon Respondent and its officers, directors, employees, agents, successors, and assigns.

53. Any change in the legal status of Respondent, including but not limited to any transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this AOC.

54. Respondent admits to the jurisdictional allegations set forth within this AOC.

55. Respondent waives any and all claims for relief and otherwise available rights or remedies to judicial or administrative review which Respondent may have with respect to any issue of fact or law set forth in this AOC, including, but not limited to any right of judicial review of the AOC under the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

56. Each party shall bear its own costs and attorneys' fees in connection with the action resolved by this AOC.

57. Pursuant to Section 309(a)(4) of the CWA, 33 U.S.C. § 1319(a)(4), the EPA has sent a copy of this AOC to the State of Georgia.

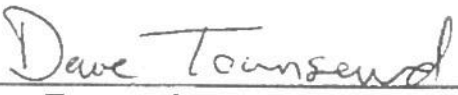
Each undersigned representative of the parties to this AOC certifies that he or she is fully authorized to enter into the terms and conditions of this AOC and to execute and legally bind that party to it.

VI. Effective Date

58. This AOC shall become effective upon receipt by Respondent's counsel of a copy of the fully executed AOC.

IT IS SO AGREED,

BY RESPONDENT PILGRIM'S PRIDE CORPORATION:



Dave Townsend
VP Environmental

Date: 10/26/15

BY THE U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 4:



James D. Giattina
Director
Water Protection Division

Date: 11/19/15



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4

ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JAN 28 2015

CERTIFIED MAIL 7012 1010 0001 8097 2430
RETURN RECEIPT REQUESTED

Mr. Stephen James
Southeast Director of Environmental Engineering
Pilgrim's Pride Corporation
949 Industrial Boulevard
Gainesville, Georgia 30501

Re: Compliance Evaluation Inspection Report
Notice of Violation and Opportunity to Show Cause
National Pollutant Discharge Elimination System Permit No.: GAR050000

Dear Mr. James:

On August 27, 2014, the U.S. Environmental Protection Agency Region 4 conducted a Compliance Stormwater Evaluation Inspection (CSWEI) at the Pilgrim's Pride Corporation (PPC) industrial site located at 949 Industrial Boulevard, Gainesville, Hall County, Georgia. The purpose of the CSWEI was to evaluate PPC's compliance with the requirements of Sections 301 and 402(p) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1342(p); the regulations promulgated thereunder at 40 C.F.R. § 122.26; and the State of Georgia *Authorization to Discharge Under The National Pollutant Discharge Elimination System Stormwater Discharges Associated With Industrial Activity*, Permit No.: GAR050000 (Permit), effective June 1, 2012.

The CSWEI, as described in the enclosed report, revealed that PPC failed to comply with requirements of the Permit and is therefore in violation of Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p). Specifically, PPC has failed to comply with the following Permit requirements:

1. **Permit Part 1.1.4.1.** Storm water discharges that are mixed with non-storm water, other than those allowable non-storm water discharges listed in Part 1.1.3, are not eligible for coverage under this permit. Typical non-allowable non-storm water includes: (b) vehicle and equipment washwater and (l) pavement wash water from containment zones. *(See Sections 2 and 5 of Inspection Report)*
2. **Permit Part 2.1.2.1 Minimize Exposure.** Permittees must minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance and fueling operations) to rain, snowmelt and runoff by either locating these industrial materials and actives inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface areas is not recommended). In minimizing exposure, permittees should pay particular attention to the following: (g) perform all cleaning operations indoors, under cover or in bermed areas that prevent runoff and run-on and also that capture any overspray; and (h) ensure that all wash water drains to a proper collection

system (i.e., not the storm water drainage system). **Note 1:** The discharge of vehicle and equipment wash water, including tank-cleaning operations, is not authorized by this permit. *(See Section 5 of Inspection Report)*

3. **Permit Part 2.1.2.2 Good Housekeeping.** Permittees must keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers. *(See Section 5 of Inspection Report)*
4. **Permit Part 2.1.2.5 Erosion and Sediment Controls.** Permittees must stabilize exposed areas and manage runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation and the resulting discharge of pollutants. *(See Section 5 of Inspection Report)*
5. **Permit Part 2.1.2.9 Waste, Garbage, and Floatable Debris.** Permittees must ensure that waste, garbage, and floatable debris are not discharged to receiving waters by keeping exposed areas free of such materials or by intercepting them before they are discharged. *(See Section 5 of Inspection Report)*
6. **Permit Part 3.2 Conditions Requiring Review to Determine if Modifications Are Necessary.** If any of the following conditions occur, permittees must review the selection, design, installation, and implementation of control measures 2.1.2.1 through 2.1.2.9: (b) the annual sampling result exceeds an applicable benchmark. *(See Section 4 of Inspection Report)*
7. **Permit Part 3.3 Corrective Action Deadlines.** Permittees must document the discovery of any of the conditions listed in Parts 3.1 and 3.2 within 24-hours of making such discovery. Subsequently, within 30 days of such discovery, permittees must document any corrective action(s) to be taken to eliminate or further investigate the deficiency, or if no corrective action is needed, the basis for that determination. Specific documentation required is detailed in Part 3.4. If permittees determine that changes are necessary following the review, any modifications to control measures must be made as soon as practicable following that storm event, but in no case more than ninety (90) days after the discovery, unless additional time is approved by EPD. *(Evidenced by the lab sheets and reports provided to the EPA during the inspection)*
8. **Permit Part 3.4.1 Corrective Action Discovery.** Within 24 hours of discovery or by the end of the next business day (see 3.3. above) of any condition listed in Parts 3.1 and 3.2, permittees must document the following information: (a) Identification of the condition triggering the need for corrective action review; (b) Description of the problem identified; and c. Date the problem was identified. *(Evidenced by the Site records provided to the EPA during the inspection)*
9. **Permit Part 3.4.1.1** Within 30 days of discovery of any condition listed in Parts 3.1 and 3.2, permittees must document the following information: (a) summary of corrective action taken or to be taken (or, for triggering events identified in Part 3.2 where permittees determine that corrective action is not necessary, the basis for their determination); (b) date corrective action is initiated; and (c) date corrective action is completed or expected to be completed. *(See Section 4 of Inspection Report)*
10. **Permit Part 3.4.1.2 Additional Documentation of Corrective Action.** (a) Corrective actions must be documented in the SWPPP; and (b) Corrective actions must be documented in the annual report. *(See Section 4 of Inspection Report)*

11. **Permit Part 4.1.1** Routine Facility Inspection Procedures. These routine inspections must be performed by qualified personnel (for definition, see Appendix A) with at least one member of the storm water pollution prevention team participating. At least once each calendar year, the routine facility inspection must be conducted during a period when a storm water discharge is occurring. *(See Section 4 of Inspection Report)*
12. **Permit Part 4.1.2.1** At a minimum, documentation of each routine facility inspection must include: (a) the inspection date and time; (b) the name(s) and signature(s) (signature in accordance with Appendix B.7); (c) weather information and a description of any discharges occurring at the time of the inspection; (e) any control measures needing maintenance or repairs; (g) any incidents of noncompliance observed; and (h) any additional control measures needed to comply with the permit requirements. *(See Section 4 of Inspection Report)*
13. **Permit Part 4.2.1.2** Visual assessment must be made: (b) on samples collected within the first 30 minutes of discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as possible after the first 30 minutes, and the permittee must document why it was not possible to take sample within the first 30 minutes. *(See Section 4 of Inspection Report)*
14. **Permit Part 4.2.2.1** Photo documentation is recommended. At a minimum, documentation of the visual assessment must include: (b) sample collection date and time, and visual assessment date and time for each sample; (c) personnel collecting the sample and performing visual assessment, and their signatures; (d) nature of the discharge (i.e., runoff or snowmelt); (f) probable sources of any observed stormwater contamination; and (g) if applicable, why it was not possible to take samples within the first 30 minutes. *(See Section 4 of Inspection Report)*
15. **Permit Part 4.3.** Annual Comprehensive Site Inspections. Permittees must conduct annual comprehensive site inspections consistent with the procedures set forth at Part 4.3.1 of its Permit and must document the findings of the inspections as required by Part 4.3.2 of its Permit. *(See Section 4 of Inspection Report)*
16. **Permit Part 5** Facilities must implement and maintain the provisions of the SWPPP as a condition of this permit. *(See Sections 2, 4, and 5 of Inspection Report regarding SWPPP modification, good housekeeping, preventative maintenance, first flush sampling procedures, visual inspection, benchmark sampling, annual inspection, and employee training)*
17. **Permit Part 5.1.1.2** Employee Training. Permittees must train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. *(See Section 4 of Inspection Report)*
18. **Permit Part 5.1.2.2** General location map. Provide a general location map with enough detail to identify the location of the facility and identify all receiving waters for storm water discharges. *(See Section 2 of Inspection Report)*
19. **Permit Part 5.1.2.3.** Site map must provide, among other things, the following information: a. Location and extent of significant structures and impervious surfaces. *(See Section 2 of Inspection Report)*

20. **Permit Part 6.1.7.1** Monitoring requirements in this permit begin in the first full quarter following the effective date of the permit or the permittee's date of discharge authorization, whichever comes later unless otherwise stated. This requirement was not met. (*See Section 2 of Inspection Report*)
21. **Permit Part 6.2.4** Additional Monitoring Required by EPD. EPD may notify permittees of additional discharge monitoring requirements. This requirement was not met. (*See Section 2 of Inspection Report*)
22. **Permit Part 8.U.7** If the benchmark is not achieved, then another round of BMPs must be implemented as provided in the general permit. (*See Section 2 of Inspection Report*)
23. **Permit Appendix B.14.4** Records Contents. Records of monitoring information shall include: (a) the date, exact place, and time of sampling; (b) the initials or the name(s) of the individual(s) who performed the sampling or measurements; (c) the date(s) analyses were initiated; (d) the date(s) the analysis were performed; (e) the initials or the name(s) of the individual(s) who performed the analyses; (f) references and written procedures, when available, for the analytical techniques or methods used; and (g) the results of such analyses, including the bench sheets, instrument readouts, computer disks or tapes, etc., used to determine these results. (*See Section 4 of Inspection Report*)
24. **Permit Appendix C.2.1** Applicable Benchmark Values. The applicable benchmark values shall be the same numeric values as the instream Water Quality Standard for the pollutant(s) of concern. Exceedance of a benchmark value may be used in conjunction with other information to demonstrate a violation of this permit or a violation of Water Quality Standards. (*See Section 4 of Inspection Report*)

Until compliance with the CWA is achieved, PPC is considered to be in violation of the CWA and may be subject to enforcement action pursuant to Section 309 of the CWA, 33 U.S.C. § 1319. This Section provides for the issuance of administrative penalty and/or compliance orders and the initiation of civil and/or criminal actions.

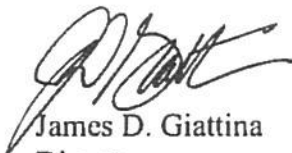
Therefore, the EPA requests that representatives of PPC contact the EPA within seven business days of receipt of this letter to arrange a meeting in this office to show cause why the EPA should not take formal civil enforcement action against PPC for these violations and any other potential violations, including the assessment of appropriate civil penalties. In lieu of appearing in person, a telephone conference may be scheduled. PPC should be prepared to provide all relevant information with supporting documentation pertaining to the violations, including but not limited to any financial information which may reflect an inability to pay a penalty. PPC has the right to be represented by legal counsel.

Please be aware that the EPA may use information provided by PPC during the meeting or telephone conference, or in any enforcement proceeding related to this matter. Failure to schedule a show cause meeting may result in a unilateral enforcement action against the PPC. Notwithstanding the scheduling of a show cause meeting, the EPA retains the right to bring further enforcement action under Sections 309 of the CWA, 33 U.S.C. § 1319, for the violations cited therein or for any other violation of the CWA.

EPA, does not create any new rights or defenses and will not affect the EPA's decision to pursue enforcement action. In addition, the Securities and Exchange Commission requires its registrants to periodically disclose environmental legal proceedings in statements filed with the Commission. To assist you, the EPA has also enclosed a document entitled *Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings*.

Please contact Miss Tara Houda, of my staff, at (404) 562-9762 to arrange a show cause meeting or to address any questions or concerns. Legal inquiries should be directed to Ms. Wilda Cobb, Associate Regional Counsel, at (404) 562-9530.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Giattina', written over the printed name.

James D. Giattina
Director
Water Protection Division

Enclosures

cc: Ms. Francis Carpenter
Georgia Environmental Protection Division

Mr. Bert Langley
Georgia Environmental Protection Division



Water Compliance Inspection Report

Section A: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)		Entry Time/Date 8:52am 8/27/2014	Permit Effective Date June 1, 2012
Pilgrim's Pride Corporation 949 Industrial Boulevard Gainesville, GA 30501 Hall County		Exit Time/Date 1:50pm 8/27/2014	Permit Expiration Date May 31, 2017
POTW: City of Gainesville			
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)		Other Facility Data (e.g., SIC NAICS, and other descriptive information)	
<ul style="list-style-type: none">Stephen James, Southeast Director of Environmental Engineering (GA, SC & FL) 706-202-5839Michael McCarty, Complex ManagerMike Ravan, Maintenance Operations 770-533-4900Jesus ColoneCliff Rule		SIC Codes: 2015, 2048 <u>Georgia EPD REP:</u> Environmental Protection Division 4220 International Parkway, Suite 101 Atlanta, Georgia 30354 telephone fax	
Name, Address of Responsible Official/Title/Phone and Fax Number			
Thomas Taylor, Complex EHS Manager 1770 Promontory Circle Greeley, CO 80634 770-533-4892			

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pollution Prevention	
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Stormwater	
<input type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Tara Houda 	USEPA Region 4/WPD-CWEB-SRES (404) 562-9762	11/7/2014
Ahmad Dromgoole 	USEPA Region 4/WPD-CWEB-SRES	11/19/14
Ken Kwan 	USEPA Region 4/WPD-CWEB-SRES	11/7/14
Signature of Management Stormwater and Residuals Enforcement Section	Agency/Office/Phone and Fax Numbers USEPA Region 4/ (404) 562-8748 Fax: (404) 562-9729	1/16/15

1. FACILITY LOCATION INFORMATION

GPS Coordinate s	Latitude	37°17'00" N			Longitude	83°49'38" W	
Receiving Water(s) or MS4	Flat Creek		Site Acreage	11.85 acres	Weather Condition	86°F Clear & dry	
Date of NOI	2/4/14 (previous ly permitted)	SIC Code(s)	<ul style="list-style-type: none">2015 Poultry Slaughterin g and Processing2048 Grain (on 2013 Annual Report)	Date of Permit Coverage (1 wk after NOI date or immediate if previous permit coverage existed)	Previous permit coverage existed	Discharge to 303(d) listed or TMDL waters	Yes. Impaired for Fecal Coliform & Bio F (Biota Impacted, Fish Community). TMDLs for Fecal Coliform & Sediment (Biota Impacted).

2. BASIC STORMWATER POLLUTION PREVENT PLAN (SWPPP) INFORMATION

SWP3 TOPICS		YES	NO	N/E
SWPPP on-site (obtain a copy of the plan)	Part 5.3.1	X		
SWPPP Certification	Part 5.1.6 / Appendix B.7	X		
Date of SWPPP and signature 8/28/2012 issued 11/26/2012 signature (Tim Hardy, Complex Manager)	Part 5.2 / Appendix B.7	X		
SWPPP modified or update to current conditions	Part 5.2.1		X	
<ol style="list-style-type: none"> From our arrival on site at 8:45am (photo DSCN0227 uncovered cage truck with chickens) to our departure at 1:50pm multiple cage trucks loaded with live chickens were observed parked outdoors in the uncovered Live Haul Trailer and Cage Storage area. On multiple occasions, inspectors observed the chickens being sprayed with water; the water then proceeded to drip off the birds, cages, and trucks and onto the ground as a non-storm water discharge (photo DSCN0293) (Permit 8.U.2 and 1.1.4). Three new cage trucks full of birds were parked here when EPA inspectors departed. The third entry in Table 6 Site Improvements and BMP Additions, 3/11/13, applies to the Live Holding Shed Containment Zone. The described improvement is moving all unwashed trailers and cages to this area or other areas that drain to wastewater. This improvement is not being adhered to (Permit 5) (photos DSCN0227, DSCN0234, and DSCN0262). At the beginning of the inspection we were told that all drains go to Gainesville wastewater treatment plant (the City) via Pilgrim's pre-treatment system. However, the drain inlet in front of the training center (photo DSCN0333) goes across the public street to the city storm drain. When cage trucks with live chickens enter the gate, they are supposed to proceed to the Live Unload Area (a covered shed located upgradient of the main parking lot) (see photos DSCN0236 and DSCN0237 with full cage truck partially uncovered and chicken feathers and droppings on uncovered concrete), each cage is unloaded with a forklift. Truck beds with cages sit here for around 15 minutes. Note part of truck is uncovered and feathers and manure on the ground. However, the Live Unload Area does not always immediately receive the cage trucks. Normally cage trucks park their beds in the Covered Live Holding Area (photo DSCN0235, note area is full) (cooled with fans) where the birds normally remain for 30-45 minutes (photos DSCN0295). Cage trucks hold 4,800-5,500 chickens; 50 trucks per day enter the facility. At 10:25 am there were six cage truck beds in the Uncovered Holding Area (see photo DSCN0262). One cage truck bed still contained chickens, which were being sprayed with water for cooling purposes. EPA inspectors were told that it is not normal for chickens to be in this area. Photo DSCN0334 Pilgrim's trucks parked across the street at the leased old concrete land – this is not in the Plan or the map. Photo DSCN0313 catchment to wastewater from final product trailers. Photo DSCN0315 Pipe from cooling tower not listed in #7 as part of source. 				
Pollution Prevention Team named in SWPPP	Part 5.1.1	X		
<ul style="list-style-type: none"> The SWPPP section 1.2 lists key personnel for enforcing and implementing the SWPPP as: Michael McCarty (Complex Manager), Cliff Rule (Plant Manager), Thomas Taylor (Safety Manager), Mike Raven (Maintenance Manager), & James Smith (Refrigeration Supervisor). 				

<p>Employee training for stormwater requirements (Include training for pest control application)</p> <p>SWPPP 7.2 "Applicable employees (i.e., all employees who work in areas where industrial materials and activities are exposed to storm water or who are responsible for implementing activities necessary to meet conditions of the Permit) must be provided SWP3 training. Training should be conducted at hiring and at least annually for existing employees and shall be documented using Table 9. Documentation for training sessions should include general content of each training session, director, attendees, and date."</p> <p>Table 9 Storm Water Pollution Prevention Training Log dated 11/7/12 lists 2 attendees (Jesus Colon, Refrigeration Supervisor and Domingo Romero, Wastewater) trained by WHEE, Inc was observed during inspection. Training certificates were included. The training included BMPs and other stormwater related topics.</p> <p>Table 9 Storm Water Pollution Prevention Training Log dated 8/29/12 lists 3 attendees from wastewater (Domingo Romero, Manuel Cortez, and Ronald Hernandez). Training was done by Jesus Colon and topics included how to sample, housekeeping, and outfalls.</p> <p>After the inspection in a 8/29/14 email, a 12/21/13 training record was provided (Appendix E Record of Discharge Prevention Briefings and Training). This record contains 50 attendees. The trainer was Stephen James and the training covered "General SPCC". SPCC Training does not meet the requirement of annual SWPP Training.</p> <p>No 2013 Stormwater pollution prevention training records were produced. Stormwater pollution prevention training from 2012 did not include all required employees.</p> <p>Permit 5.1.1.2 Employee Training. "Permittees must train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team."</p>	Part 5.1.1.2 / Part 8.U.3.1	X	
<p>Site Description (Include specifics on location of vents from cooking and drying operations, dry product vacuum lines, animal holding areas, spoiled products, and broken product containers which are exposed to stormwater and/or precipitation)</p>	Part 5.1.2.3 / 8.U.4.1	X	
<p>Site Map (Include locations of impervious surfaces, direction of stormwater flow, structural controls, receiving waters, water conveyances, pollution sources, outfalls, location of prior spills/leaks, name of MS4, industrial operations exposed to stormwater or precipitation, and areas of allowable non-stormwater discharges) Site map does not include the area across the street being used by the facility.</p>	Part 5.1.2.3	X	
<p>Identify potential pollutant sources and particular pollutants 8.U.4.2 (Include inventory of materials handled at the site, information pertaining to any pollutant source from the past 3 years, information pertaining to the storage and application of pest control chemicals) Manure is mentioned in the SWPPP, however the Permit 5.1.3.2 requires a list of pollutant(s) be included in the SWPPP. Fecal coliform should be a pollutant of concern for this site due to the fecal impairment in the Flat Creek, the exceedances of the benchmark, and the live poultry handling that takes place. Other benchmark pollutants should be clearly identified as pollutants with possible sources identified in the SWPPP. See photos DSCN0299, DSCN0300, DSCN0296, DSCN0292, DSCN0271, and DSCN0237.</p>	Part 5.1.3 / 5.4.12 / 8.U.4.2	X	
<p>Stormwater Analytical Sampling Data SWPPP 6.3.2</p>	Part 5.1.3.6 / 7.3	X	
<p>Description of the Control Measures (Describe operational and structural controls implemented at the site) SWPPP 4 BMPs BMPs should be evaluated in light of benchmark exceedance of fecal coliform and fecal coliform being a potential source (see comments above in Identify Potential Pollutant Sources) and descriptions should reflect this. Structural BMP controls (Permit Sector 8.U.7.2) are largely lacking, SWPPP relies heavily on operational BMP controls which do not have a successful track record at this site. Bacterial specific structural BMPs, focusing on fecal coliform sources and treatment, should be clearly evaluated in the plan.</p>	Part 5.1.4 / 8.W.7	X	
<p>Schedule and Procedures for Good Housekeeping SWPPP 4.1 Housekeeping and Other general Pollution Prevention BMPs</p> <ul style="list-style-type: none"> SWPPP 4.1.1 "Storm water drainage structures (i.e., drop inlets, sumps, etc.) shall be regularly inspected, and kept clean and free of dirt, trash and other debris." "Storm water containment sumps shall be routinely emptied/cleaned, and Facility personnel shall actively monitor Pump Truck pumping operations from applicable storm water sumps." SWPPP 4.1.1 "Clean-up of the Live Holding Shed, Containment Zones, scale area, cage storage areas, etc. and toehr outdoor areas where manure, dirt, dust, feathers, etc. from Live Haul/Receiving operations may accumulate, shall be performed on a routine basis." <ul style="list-style-type: none"> Feathers and debris accumulation were observed on a grate (photo DSCN0261). Routine basis (frequencies and methods) should be clearly documented in schedules. SWPPP 4.1.1 "Live Haul, Offal and DAF Skimmings Trailers shall not be parked in areas outside of Containment Zones unless washed down/cleaned of possible pollutants (poultry litter, offal tracking, etc.) and leakage of trailers is not possible, as applicable." <ul style="list-style-type: none"> The Live Haul Trailer and Cage Storage Area is not a designated Containment Zone. 	Part 5.1.5.1(a)(i)	X	

- Uncovered cage trucks were parked in this area (photo DSCN0262).
- SWPPP 4.1.1 "Clean-up of the Live Holding Shed, Containment Zones, scale area, cage storage areas, etc. and other outdoor areas where manure, dirt, dust, feathers, etc. from Live Haul/Receiving operations may accumulate, shall be performed on a routine basis."
 - Feathers and manure were observed on the ground in multiple outdoor areas (photos DSCN0271, DSCN0275, DSCN0296).
- CBMPPP 4.1.1 "Regularly pickup/clean-up and properly dispose of solid waste materials that may collect around the Site."
 - Feathers and manure were observed on the ground in multiple outdoor areas (photos DSCN0271, DSCN0275, DSCN0296, DSCN0297, & DSCN0326).
- SWPPP 4.1.1 "Prevent waste, garbage and floatable debris from discharging to receiving waters by keeping tops/lids on applicable roll off boxes and other waste receptacles, keeping exposed areas free of debris and/or by installing systems to intercept debris prior to their discharge to receiving waters."
 - Uncovered roll offs were observed in 2 areas of the site (photos DSCN0326 & DSCN0310).
- SWPPP 4.1.2.1 "Perform routing dry clean-up of live animal holding and handling Containment Zones at the Facility to prevent excessive accumulations of feathers, dusts and other debris that may contribute to excessive fugitive dust emissions from Facility."
 - Feathers and manure were observed on the ground in multiple outdoor areas (photos DSCN0275, DSCN0296, DSCN0297).
- SWPPP 4.1.1 "Empty cages with significant poultry manure residues should be stored in Containment Zones."
 - The Live Haul Trailer & Cage Storage Area, where cage trailers are currently stored, is not a designated Containment Zone.
- Cooling birds (photo DSCN0293) in parking lot results in water sheet flowing towards stormwater inlets. This is not an authorize non-stormwater discharge (Permit 1.1.4.1). Contaminated rinse water from covered Live Holding Shed Containment Zone, designed for "complete capture" is escaping from the shed and entering the parking lot, meaning that this area is not adequately designed for complete capture. The area with loaded chicken trailers has runoff into the Loaded Refrigerator Trailer Parking Area where stormwater drains via sheet flow to Outfall 002.
- SWPPP 4.1.1 "Live Haul, Offal and DAF Skimmings Trailers shall not be parked in areas outside of Containment Zones unless washed down/cleaned of possible pollutants (poultry litter, offal tracking, etc.) and leakage of trailers is not possible, as applicable." CBMPPP 4.1.1 "Equipment and vehicles, including Live Haul trailers, offal trailers, DAF skimmings trailers, refrigerated trailers, forklifts, etc. stored in outdoor areas outside Containment Zones shall be kept clean and free of excessive amounts of dirt, debris, poultry litter, oil/grease, etc."
 - Trailer with blood on the exterior was parked uncovered outdoors in a non-containment zone (photo DSCN0316).
- SWPPP 4.1.2.5 Outdoor Materials and Equipment Storage Areas "No open drums or other open containers shall be stored in these areas."
 - Drums stored uncovered outdoors (photo DSCN0321). Bins were stored outdoors uncovered (photo DSCN0322).
- CBMPPP 4.1.1 "Empty drums shall be routinely sent offsite for disposal/recycling."
 - Drums stored uncovered outdoors (photo DSCN0321).
- CBMPPP 4.1.1 "Adequate vegetation and rip/rap materials shall be maintained in areas subject to excessive sedimentation and erosion (i.e. unpaved areas, drainage ditches, etc.)."
 - Drums stored uncovered outdoors (photo DSCN0321). Area lacks vegetation to stabilize slopes (photo DSCN0323).
- SWPPP 4.1.2.5 Outdoor Materials and Equipment Storage Areas "No open drums or other open containers shall be stored in these areas."
 - Drums stored uncovered outdoors (photo DSCN0321) in the Outdoor Materials and Equipment Storage Area. Bins were stored outdoors uncovered (photo DSCN0322).
- SWPPP 4.1.2.8 Trash Compactors, Roll Off Boxes, and Bins "Lids, covers, tarps, etc. shall be maintained on solid waste roll off boxes and other onsite waste receptacles containing solid waste onsite except when in active use to prevent the entry and release of rainwater."
 - Uncovered dumpsters/roll-offs (photo DSCN0324, DSCN0326). Holes in roll off (photo DSCN0330).
- SWPPP 4.1.2.8 Trash Compactors, Roll Off Boxes, and Bins "Ensure scrap cage parts stored in the Cage Parts Bin are cleaned of excessive poultry litter, feathers, etc. prior to being transferred to scrap metal bins."
 - Feathers were observed on metal parts in a uncovered roll off.
- Maggots were observed on concrete, in pipes, and in liquid flowing in a pipe that crosses the parking area by the uncovered Loaded Refrigerated Trailer Parking Area/Live Haul Trailer and Cage Storage Area/DAF Skimmings Loadout Area (see photo DSCN0265). After EPA inspectors asked about this, a disinfectant (called Calcium Hypochlorite, Hydrated Mixture) was applied (photo DSCN0288). The SWPPP 4.1.2.1 says these should be applied during "dry weather (i.e., when rain is not forecast within the next 24 hours at a 30 percent or higher chance) and is applied in a manner such that there is no discharge to storm water drainage features." When site representatives were asked about who makes the decision when to apply disinfectants they said that it is done as needed by the wastewater operators (Domingo Romero, Ronald Hernandez, Jose Lopez, Reyaz Segoia); they use lime anytime blood is on the ground. Jose and Stephen could not tell me who makes the decision when to apply Calcium Hypochlorite, but that it was not applied by the wastewater operators. The disinfection procedures in the SWPPP are not being adhered to.

Schedule and Procedures for Preventive Maintenance No schedules were presented. No routine or preventative maintenance schedule observed for first flush pumps or spare part inventory.	Part 5.1.5.1(a)(ii)		X	
Contains Spill Prevention & Response Procedures SWPPP 5	Part 5.1.5.1(a)(iii) / 2.1.2.4	X		
Schedule and Procedures for Monitoring (procedures for benchmark, effluent limit, and impaired stream monitoring) Two reasons have been given for the shortage of sampling events. The first is the difficulty to get fecal coliform samples to the lab within the 6 hour holding time. This reason does not carry much weight because the facility operated 5-6 days per week from 4:55am-4:30am and is not located a long way from the lab. Facility representatives indicated that the lab is located at a location where Pilgrim's Pride trucks go between every day as part of normal operations. Lab sheets indicate that samples have reach the lab in 2 hours and 29 minutes (9:30-14:06, 12:25-13:05, 11:00-13:39). Ampro Laboratories is 16 miles from Pilgrim's Pride, roughly a 24 minute drive. The second reason is that the facility claimed to have a shortage of qualifying events. EPA examined rain events (Table B. Weather History & Observations in Gainesville) for June-October 2012 and November-December 2013. The June-October 2012 (only one sample was collected in May-October 2012) did not have 4 samples within 30 days for any of the outfalls to assess the geometric mean for fecal coliform, despite there having been 10 occurrences where 4 rain events greater than 0.1" at least 72 hours from the previous qualifying rain event. When examining November-December 2013, EPA found 5 occurrences where 4 qualifying sample sets could have been collected; Pilgrim's Pride's 2013 Annual Report stated that despite an April 26, 2013 request by GA DNR to sample monthly, only 6 sampling dates occurred "due to periods of little rain and also rain events less than 72 hours apart, opportunities were scarce. As noted before, the greatest hindrance to sampling is the 6 hour holding time for fecal testing." The 2012 Annual Report blamed "the restraint of the 6 hour holding time for fecal coliform along with the rain patterns in 2011 and 2012, made getting samples to the lab on time difficult." Only 5 sampling dates occurred in 2012, 4 for fecal coliform. EPA compiled sampling data in Table A Pilgrim's Outfall Sampling Data, in 2010, 2011, 2012 and 2013, not even once did Pilgrim's Pride collect 4 samples in May-October or November- April of a given year.	Part 5.1.5.2	X		
Schedule and Procedures for Routine Inspections (Quarterly minimum inspections of control measures and processes exposed to precipitation and/or stormwater including, but not limited to, loading/unloading areas, material handling and storage areas, waste management units, vents/stacks from processes, spoiled products, broken product container holding area, animal handling and staging area, and pollution control equipment) SWPPP 6.1 Daily, weekly and monthly inspections	Part 5.1.5.2(e) / 8.U.5	X		
Schedule and Procedures for Quarterly Visual Inspections {discharges area(s)} SWPPP 6.1.4 Table 10A Storm Water Quality Visual Assessment Log fails to adequately document that samples are being taken during the first flush time period.	Part 5.1.5.2(e)		X	
Schedule and Procedures for Annual Comprehensive Inspections SWPPP 6.1.5	Part 5.1.5.2(e)	X		

3. SITE DESCRIPTION and SWPPP

- Facility has 2 daytime production shifts (4:55am-1:25pm and 1:55pm-10:25pm) and one nighttime cleaning shift (10:30pm-4:30am). 1.4 million gallons of water is used per day (30% for washdown/sanitation & 60% for production shifts). Plant is operational 5-6 days per week. Live broilers are delivered via truck and are slaughtered, eviscerated, and processed. About 260,000 chickens are processed per day (this is 90% capacity); the weekly average is about 1,500,000 birds slaughtered. The facility's end product are processed chicken "tray packs" that are carried in grocery stores. Material that is screened from offal/wastewater is sold to produce pet food. Process wastewater is treated onsite in the wastewater pretreatment system (screening, flow equalization, and dissolved air flotation) before going to the POTW. There are about 1,300 employees at the plant, of which about 100 are salary employees. The evisceration process uses the most water because scalding water is used to help remove feathers from chicken skin.
- Floating fats were observed exiting the wastewater flume (576 GPM to the city's system (photos DSCN0272-0273). In April 2013 there was a FOG slug and their annual report has 2 BOD and 1 FOG violations for pre-treatment.
- The SWPPP was prepared by WHEE and dated 8/28/2012. It was signed by Tim Hardy on 11/26/12.

4. RECORD REVIEW

Record Review	YES	NO	N/E
Representative on-site <ul style="list-style-type: none"> Stephen James, Michael McCarty, Mike Ravan, Jesus Colone, Cliff Rule 	X		

Supplemental BMP Program required (303d listed waters)? SWPPP 2.7 305(b)/303(d) list (2010 list) – Flat Creek, Headwaters, Gainesville to Lake Lanier (Reach ID R031300010808) Revised Total Maximum Daily Load Evaluation for Seventy-Nine Stream Segments in the Chattahoochee River Basin for Fecal Coliform – November 2008 Total Maximum Daily Load Evaluation for Twenty-Five Stream Segments in the Chattahoochee River Basin For Sediment (Biota Impacted) – January 2008 SWPPP 6.3.2.2 Monitoring of Discharges to an Impaired Stream Segment	X	
NOI Submitted to EPD Part 5.4.1	X	
Records of incidents with spills, leaks, and/or other releases of pollutants Part 5.4.3 (should include dates and descriptions of incident and details of the corrective actions) Inspectors were informed that there have been no spills or leaks in the past few years.		X
Records of maintenance and repairs of control measures Part 5.4.4 (dates and descriptions of regularly scheduled and discovered maintenance needs) No regularly scheduled maintenance records were observed. At the time of inspection EPA inspectors requested a chronology of BMP changes over the years. EPA inspectors were able to review Table 6 Site Improvements and BMP Additions, which contained 5 improvements (9/19/12, 3/11/13, 3/11/13, 6/5/13, 10/12/13). The record indicates that the SWPPP was updated for each of these improvements. <ul style="list-style-type: none"> The first entry, 9/19/12, applies to the Offal Trailers Storage Containment Zone. The described improvement is closing trailer valves until trailers are backed into wastewater. Table 6 indicates that the SWPPP was updated to reflect this change, however pages 7-8 and 18 do not include this modification. SWPPP modifications should be made within 30 days (Permit 5.2.1). The second entry, 3/11/13, applies to the Southeastern Refrigerated Trailer Parking. The described improvement is moving loaded red water drainage trailers to drain into wastewater. This "improvement" does not appear to be an improvement. The 2012 version of the SWPPP 4.1.2.6 already states that "applicable loaded refrigerated trailers (i.e., those with "red water" drainage) shall only be parked in Containment Zones." The third entry in Table 6 Site Improvements and BMP Additions, 3/11/13, applies to the Live Holding Shed Containment Zone. The described improvement is moving all unwashed trailers and cages to this area or other areas that drain to wastewater. Table 6 indicates that the SWPPP was updated to reflect this change, however pages 7-8 and 18 do not include this modification. SWPPP modifications should be made within 30 days (Permit 5.2.1). The 6/5/13 entry applies to Loaded Refrigerated Trailer Parking and having had instructed drivers to park trailers so that red water drains into the wastewater drain area. There is no training record documenting implementation of this change. The SWPPP 4.1.2.6 already states that "applicable loaded refrigerated trailers (i.e., those with "red water" drainage) shall only be parked in Containment Zones, and these trailers shall be parked in a manner that provides effective containment and collection of red water drainage." Therefore, this "improvement" does not appear to be an improvement. The 10/12/13 entry is adding a chain and posts on top of the concrete wall in the Live Haul Trailer and Cage Storage Area to prevent refrigerated trailers from backing over it. This improvement is documented in SWPPP 1.2.c. and dated 10/12/13 with a signature. This modification was not observed at time of inspection. In a 9/22/14 email, EPA received an updated copy of the above Table 6 which now also contains 10/30/12, 6/30/14, and 8/8/14 improvements. This record was updated months to years late depending on the action. Overall, routine inspections contain very little recorded maintenance and hardly any to no repair records.	X	
Records of routine inspections Part 5.4.5 <ul style="list-style-type: none"> Pilgrim's does not have a Daily Inspection Log, but a visual inspection is done by the person who checks the rain gauge. SWPPP 6.1.1 Daily Inspections "Inspect daily, areas or operations that pose significant potential threats to storm water due to poor housekeeping and/or potential for spillage. Because of the nature of Site operations, routine daily visual inspection of Facility operations are constantly being performed at the Site, and significant potential threats to storm water are quickly identified and addressed." Line leader who does weekly inspection, tells supervisor when something needs to be corrected or maintained. There is not log for recording the actions to address the problems. Routine/quarterly inspections Permit 4.1.2.1 At a minimum, documentation of each routing facility inspection must include: a. The inspection date and time; b. The name(s) and signature(s) (signature in accordance with Appendix B.7); c. Weather information and a description of any discharges occurring at the time of the inspection; e. Any control measures needing maintenance or repairs; g. any incidents of noncompliance observed; and h. Any additional control measures needed to comply with the permit requirements. <ul style="list-style-type: none"> <u>Table 2A Routine Weekly Inspection</u> <ul style="list-style-type: none"> 8/8/14, 8/15/14, 8/22/14, 7/25/14, 6/27/14, 4/25/14 Table 2A Routine Weekly Inspection Log– printed first name and last initial in signature blank, no full last name on form (Permit 4.1.2.1.b) 8/15/14 Table 2A Routine Weekly Inspection Log – all areas being inspected were not filled out. 7/4/14 Table 2A Routine Weekly Inspection Log – incorrectly filled out. It says "yes," control measures are adequate and operation, but then the next box contains "If no, then control 	X	

measure(s) in need of which action(s)? "maintenance". No additional control measures detailing what maintenance was needed is recorded.

- 5/9/14 Table 2A Routine Weekly Inspection Log does not include weather information (Permit 4.1.2.1.c).
- Table 10 Weekly Visual AST Inspection Log
 - 3/9/13 Inspection Log not filled in.
- AST Monthly Inspection
 - Routine AST Monthly Inspections do not include weather information (Permit 4.1.2.1.c).
 - 8/4/14, 7/4/14, 10/2/14, 11/2/10 Routine AST Monthly Inspections not completely filled out (areas were left unchecked)
 - 8/4/14 AST Monthly Inspection - printed full name, not a signature in signature blank (Permit 4.1.2.1.b)
 - 7/4/14 AST Monthly Inspection - printed full name, not a signature in signature blank (Permit 4.1.2.1.b)
 - 10/2/10 AST Monthly Inspection - printed full name, not a signature in signature blank (Permit 4.1.2.1.b)
 - 11/2/10 AST Monthly Inspection - printed full name, not a signature in signature blank (Permit 4.1.2.1.b)
- Table 10A Storm Water Quality Visual Assessment Log
 - 1/3/13 Table 10A Stormwater quality visual assessment log Q1- printed full name, not a signature in signature blank (Permit 4.1.2.1.b), no nature of discharge (SWPPP 6.3.1), no time of visual assessment (SWPPP 6.3.1)
 - 1/2/14 Table 10A Stormwater quality visual assessment log Q1- printed full name, not a signature in signature blank (Permit 4.1.2.1.b)
 - 4/29/14 Table 10A Stormwater quality visual assessment log Q2- printed full name, not a signature in signature blank (Permit 4.1.2.1.b)
 - 7/10/14 Table 10A Stormwater quality visual assessment log Q4- No signature for personnel performing assessment (Permit 4.1.2.1.b), no name of personnel performing assessment (SWPPP 6.3.1), no nature of discharge (SWPPP 6.3.1), no time of visual assessment (SWPPP 6.3.1), form appears to be incomplete (no signs of pollution were checked and No Visible Signs of Pollution was checked)
 - 3/3/14 Table 10A Stormwater quality visual assessment log Q1- printed full name, not a signature in signature blank (Permit 4.1.2.1.b)
 - SWPPP 6.3.1 Storm Water Discharge Visual Sampling and Assessment "The following information shall also be recorded in Table 10A" "time of visual assessment of sample" name and signature of personnel collecting the sample" name and signature of personnel performing the visual assessment" "nature of discharge (i.e., runoff or snowmelt)" "Probable sources of any contamination visually observed in sample"
- Table 10B Storm Water Quality Analytical Sampling Log
 - 3/12/13 Table 10B Stormwater quality analytical sampling log - printed full name, not a signature in signature blank (Permit 4.1.2.1.b)
 - No date Table 10B Stormwater quality analytical sampling log - printed full name, not a signature in signature blank (Permit 4.1.2.1.a & 4.1.2.1.b)
 - 3/3/14 Table 10B Stormwater quality analytical sampling log - printed full name, not a signature in signature blank (Permit 4.1.2.1.b)
 - Date not present Table 10B Stormwater quality analytical sampling log - printed full name, not a signature in signature blank (Permit 4.1.2.1.a & 4.1.2.1.b)
 - Date not present Table 10B Stormwater quality analytical sampling log - printed full name, not a signature in signature blank (Permit 4.1.2.1.a & 4.1.2.1.b)
 - Form 10B does not contain a space for "the presence or absence of floating solids or visible foam in other than trace amounts."
 - Estimated volume discharged through each outfall is not being completed.
- 2/21/14 Chain of Custody - no sampler signature
- 1/2/14 11:11am Benchmark monitoring: Chain of Custody and Certificate of Analysis does not indicate duration of rainfall, total rainfall, time since the previous measureable storm event, and estimated volume (in gallons) of discharge sampled.
- 2/21/14 4:00am Benchmark monitoring: Chain of Custody and Certificate of Analysis does not indicate duration of rainfall, total rainfall, time since the previous measureable storm event, and estimated volume (in gallons) of discharge sampled.
- 3/11/13 7:00am Benchmark monitoring: Chain of Custody and Certificate of Analysis does not indicate duration of rainfall, total rainfall, time since the previous measureable storm event, and estimated volume (in gallons) of discharge sampled.
- 6/25/13 14:42 Benchmark monitoring: Chain of Custody and Certificate of Analysis does not indicate duration of rainfall, total rainfall, time since the previous measureable storm event, and estimated volume (in gallons) of discharge sampled.
- July 2013 "There were no rain events in the month of July that met the guidelines of 72 hrs between the last rain and when a sample is to be taken."
 - Weather monitoring data indicated that it rained 1.14" on July 1, 2013 in Gainesville, GA.
- 8/1/13 3:01 Benchmark monitoring: Chain of Custody and Certificate of Analysis does not indicate duration of rainfall, total rainfall, time since the previous measureable storm event, and estimated volume (in gallons) of discharge sampled.
- 8/9/13 4:00 Benchmark monitoring: Chain of Custody and Certificate of Analysis does not indicate

<p>duration of rainfall, total rainfall, time since the previous measureable storm event, and estimated volume (in gallons) of discharge sampled.</p> <ul style="list-style-type: none"> September 2013 "where were only two rain events in September. Both occur outside the time lines to collect a sample and get it to the lab in a timely matter." 11/1/13 7:15 Benchmark monitoring: Chain of Custody and Certificate of Analysis does not indicate duration of rainfall, total rainfall, time since the previous measureable storm event, and estimated volume (in gallons) of discharge sampled. 12/4/13 3:10 Benchmark monitoring: Chain of Custody and Certificate of Analysis does not indicate duration of rainfall, total rainfall, time since the previous measureable storm event, and estimated volume (in gallons) of discharge sampled. 3/12/13 Table 10B Storm Water Quality Analytical Sampling Log: No estimated volume (in gallons) of discharge sampled. Table 10B Storm Water Quality Analytical Sampling Log: No estimated volume (in gallons) of discharge sampled and no date sampled. 	
<p>Records of quarterly visual inspections (collected in first 30 min of discharge) Part 5.4.5 / 5.4.6 (Include description of any causes of varying from the schedule)</p> <ul style="list-style-type: none"> Table 2B Routine Quarterly Inspection Logs <ul style="list-style-type: none"> Table 2B Routine Quarterly Inspection Logs do not include the date of inspection (Permit 4.1.2.1.a) 1st quarter 2014 (4 forms, no dates) Table 2B Routing Quarterly Inspection Log - printed full name, not a signature in signature blank (Permit 4.1.2.1.a & 4.1.2.1.b) Does not include weather (Permit 4.1.2.1.c). 2nd quarter 2014 (2 forms, no dates) Table 2B Routing Quarterly Inspection Log - printed full name, not a signature in signature blank (Permit 4.1.2.1.a & 4.1.2.1.b) 3rd quarter 2014 (2 forms, no dates) Table 2B Routing Quarterly Inspection Log – printed first name and last initial in signature blank, no full last name on form (Permit 4.1.2.1.a & 4.1.2.1.b). For 3 areas being inspected, form is not completely filled out in regards to whether control measures are adequate and operational. For 3 other areas being inspected, form is not completely filled out for whether the area being inspected has a satisfactory condition. <ul style="list-style-type: none"> Permit 4.1.2.1 "At a minimum, documentation of each routine facility inspection must include: a. The inspection date and time; b. The name(s) and signature(s) of the inspector(s) (signature in accordance with Appendix B.7); c. Weather information and a description of any discharge occurring at the time of the inspection; d. Any previously unidentified discharges of pollutants from the facility for the previous three (3) years; e. Any control measures needing maintenance or repairs; f. Any failed control measures that need replacement; g. Any incidents of noncompliance observed; and h. Any additional control measures needed to comply with the permit requirements." The Quarterly logs reviewed did not have the name or signature of a participating stormwater pollution prevention team member (Permit 4.1.1). <ul style="list-style-type: none"> Permit 4.1.1 Routine Facility Inspection Procedures. "These routing inspections must be performed by qualified personnel (for definition, see Appendix A) with at least one member of the storm water pollution prevention team participating. At least once each calendar year, the routing facility inspection must be conducted during a period when a storm water discharge is occurring." Quarterly Inspections: 1st part does not list date. Quarterly Visual Assessment Procedures Permit 4.2.1.2 The visual assessment must be made: b. On samples collected within the first 30 minutes of discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as possible after the first 30 minutes, and the permittee must document why it was not possible to take sample within the first 30 minutes. <ul style="list-style-type: none"> Table 10A Stormwater Quality Visual Assessment Log does not document the time rain began or the time discharge began, therefore, it is impossible to determine based on the records whether the sample time was within the first 30 minutes of discharge (Permit 4.2.1.2.b). Quarterly Visual Assessment Documentation Permit 4.2.2.1 Photo documentation is recommended. At a minimum, documentation of the visual assessment must include: b. Sample collection date and time, and visual assessment date and time for each sample; c. Personnel collecting the sample and performing visual assessment, and their signatures; d. Nature of the discharge (i.e., runoff or snowmelt); f. Probable sources of any observed stormwater contamination; and g. If applicable, why it was not possible to take samples within the first 30 minutes. <ul style="list-style-type: none"> No photo documentation of visual assessments. Table 10A Stormwater Quality Visual Assessment Log only contains one date and the "time sample(s) collected". Only one time is filled out for 3 outfalls which are spaced in different areas of the facility, therefore, 2 sample collection times are missing (Permit 4.2.2.1.b). Based on this form, it unclear if the date on the form is for the sample collection or the visual assessment (Permit 4.2.2.1.b). Time of visual assessment for each sample is not on the form (Permit 4.2.2.1.b). 1/3/13 Q1 Outfalls 1 & 3, 1/2/14 Q1 Outfalls 1, 2, & 3, 3/3/14 Q1 Outfall 3, 4/29/14 Q2 Outfall 1, 7/10/14 Q4 Outfall 3, 3/11/13 Q1 Outfall 1 & 2, 6/25/13 Q2 Outfalls 1 & 2, 8/1/13 Q3 Outfalls 1 & 3, 11/1/13 Q4 Outfall 3, 12/4/13 Q4 Outfalls 1, 2, & 3 - No probable sources of observed stormwater contamination is listed on the documents reviewed (Permit 4.2.2.1.f), despite multiple outfall quarterly visual assessments documenting color and floating solids. On samples where colors and floating solids were documented, it was recorded as "no visual signs of pollution," without any rational as to why these indicators or stormwater pollution were not indicators for these samples. When non-clear samples are observed, facility should investigate the upstream source and note in comments section. Also, Permit 	X

4.2.2.1.g. requires documentation that sample was taken within the first 30 minutes. Looking at Table 10A it is impossible to verify that that condition was met because rainfall start time/discharge start time is not noted.

- o 3/11/13 Q1 Outfall 3 Quarterly Visual Inspection – checklist for parameters was not completed.

Records of comprehensive annual inspections

Part 5.4.5

- Permit 4.3. Annual Comprehensive Site Inspection Procedures.
 - o The 2013 Table 3 Annual Comprehensive Site Inspection Reporting Form appears to have been a perfunctory action. Many items (17 of 24 from part A) on the list do not have anything filled out for either column (conditions and comments). Many of these items clearly require a response as part of the inspection (ex: "Have all applicable employees received training on SWP3 requirements? Quarterly storm water discharge visual examinations performed?"), for 2013 only 7 of 24 blanks were filled out. Observation of outfalls is not included in 2013 reporting form (Permit 4.3.1.f). Despite the facility not meeting benchmarks multiple years in a row, the form said "no" revisions are required to SWP3. The last page, Appendix D Annual Facility Inspection Checklist for the SPCC is unsigned by the Environmental Health and Safety Manager.
- SWPPP 6.1.5 Annual Inspections/Evaluations "The Annual Comprehensive Site Inspection shall be performed at least once during each of the following time periods: Year 1: June 1, 2012- December 31, 2012" – Facility representative was unable to locate the 2012 Annual Comprehensive Site Inspection Report as of 9/22/2014. Potentially, also missing the Non-stormwater discharge certification for 2012 because the 2013 certification was attached to the 2013 Annual Comprehensive Site Inspection Report.

X

Inspections conducted by qualified personnel

- AST Monthly Inspections by Domingo Romaro
- Rain Gauge Readings by D.R. (Domingo Romaro), J.C. (Jesus Colon), R.H. (Ronald Hernandez), F.M.
- Storm Water Quality Visual Assessments, Routine Quarterly Inspection Log, & samples by Domingo Romaro
- Annual Comprehensive Site Inspection Reporting Form by James Smith (inspector) & Tim Hardy (signature) & plant manager (signature)

Records of employee training

Part 5.4.11

- Appendix E Record of Discharge Prevention Briefings and Trainings: General SPCC 12/21/13 (87 employees)
- Table 9 Storm Water Pollution Prevention Training Log: BMPs, monitoring, inspection, planning, reporting & documenting 11/7/12 (2 employees: Jesus Colon & Domingo Romero)
- Table 9 Storm Water Pollution Prevention Training Log: How to sampling, housekeeping & outfalls 8/29/12 (Domingo Romero, Ronald Hernandez, Manuel Cortez)
- The SWPPP section 1.2 lists key personnel for enforcing and implementing the SWPPP as: Michael McCarty (Complex Manager), Cliff Rule (Plant Manager), Thomas Taylor (Safety Manager), Mike Raven (Maintenance Manager), & James Smith (Refrigeration Supervisor).

X

The SWPPP says disinfectants should be applied when certain criteria are met (SWPPP 4.1.2). The wastewater operators (Domingo Romero, Ronald Hernandez, Jose Lopez, Reyaz Segola) are responsible for this. Only 1 of the 4 wastewater operators received SWPPP training in 2012. No SWPPP training log was provided for 2013. Seven staff members are listed as part of the Stormwater Pollution Prevention Team in the SWPPP, but only 2 of these members were trained in 2012. It appears that training has been focused on managers, instead of all applicable employees.

Permit 5.1.1.2 Employee Training. Permittees must train all employees who work in areas where industrial materials or activities are exposed to storm water, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Training must cover both the specific control measures used to achieve the effluent limits, and monitoring, inspection, planning, reporting and documentation requirements in other parts of this permit. EPD recommend that training be conducted at hiring and annually for existing employees. Rosters of employee training or certificates of completion that include individual names and training dates must be maintained with the SWPPP or be readily available onsite.

Records of Benchmark Sampling

Part 5.4.8

- Pilgrim's uses Ampro Laboratories in Cumming which is owned by the company that does their rendering. They send samples with a rendering truck driver and cooler. Fecals have a 6 hour holding time and they have stated that they had a hard time meeting the holding times. The lab closes at 5:00pm.
- Fecal coliform benchmarks are regularly exceeded. TSS benchmarks were regularly exceeded in the past. Adequate sample to calculate a geometric mean for benchmark purposes are not being collected.

X

Records of corrective actions

Part 5.4.7

Remove line

5. SITE EVALUATION & SWP3 IMPLEMENTATION

Pollutant Sources

Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and pollutants off-site

Loading/Unloading Area	<ul style="list-style-type: none"> • Good house keeping was not observed in multiple locations. • Photo DSCN0271 feathers on ground outside covered holding area • Photo DSCN0290 Back end of redwater (blood) trailers are parked so that they hang over a trough that goes to wastewater. See photo DSCN0292 with blood on ground flowing away from the designated inlet structure. • The outside parking lot is washed down daily with hose where there is blood. • Some flow could go down the entrance to the city storm drains. • Feathers and water were noted on the ground inside of and outside of Live Receiving (See photo DSCN0238) • Fork lifts are washed between Live Receiving and Holding Shed in the uncovered parking lot. • Permit 2.1.2.2 Good Housekeeping. Permittees must keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers. • Permit 1.1.4 typical non-allowable non-storm water includes (b) vehicle and equipment washwater and (f) pavement wash water from containment zones • Permit 1.1.3 allowable non-storm water discharges (g) pavement wash waters where no detergent s are used and no spills or leaks of toxic or hazardous material have occurred (unless all spilled material has been removed); (h) Routine external building washdown that does not use detergents
Outdoor Storage Facilities	<ul style="list-style-type: none"> • Photo DSCN0304 Tracking by exit near train tracks. Frozen and empty trucks are staged here. • Photo DSCN0305 Tracking of raw chicken outside. Permit 2.1.2.2 Good Housekeeping. Permittees must keep clean all exposed areas that are potential sources of pollutants, using such measures as sweeping at regular intervals, keeping materials orderly and labeled, and storing materials in appropriate containers. • Photo DSCN0330 uncovered dumpster with punctures. • Photos DSCN0327 and DSCN0329 uncovered material storage (Permit 2.1.2.1). • DSCN0323 area lacking adequate vegetation (Permit 2.1.2.5). • DSCN0326 trash accumulation down gradient, near outfalls (Permit 2.1.2.9).
Outdoor Manufacturing/Processing Operations	<ul style="list-style-type: none"> • Photo DSCN0270 loose feathers by wastewater pre-treatment facility. Feathers on ground near pre-treatment and Live Holding Shed Containment Zone (DSCN0271). Photo DSCN0275 feathers behind wastewater pre-treatment sampling point (Permit 2.1.2.2 & SWPPP 4.1.1).
Vents or Stacks Cooking and/or Drying Operations	n/a
Animal Holding and Handling Areas	See Outdoor Manufacturing/Processing Operations.
Spoiled Product Storage Areas	n/a
Broken Product Container Storage Area	n/a
Liquid Storage Tanks	
Fueling Stations/Equipment Maintenance areas & Cleaning areas	
Management of Run-off Controls (Storage areas, diversion ditches, dumpsters, secondary containment, etc...)	
Sediment & Erosion Controls (BMPs)	See Outdoor Storage Facilities.
Spills/Leaks Handling	n/a

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS

Outfall, Stormwater Discharge & Receiving Water	YES	NO	
Number & location of stormwater discharge(s)/outfall(s) consistent with the SWP3			<p>Describe:</p> <ul style="list-style-type: none"> Outfall 001 (0.75 acres) is from a non-process area (Outdoor Materials and Equipment Storage Area and empty Box Trailer Overflow Parking). Photos DSCN0327 and DSCN0329, main drop inlet for outfall 01 (note uncovered storage and unpaved). Photo DSCN0321 uncovered empty drums/barrels. Photo DSCN0322 trash on ground. Photo DSCN0323-0324 down gradient of outfall 2, note dumpsters used for scrap metals has feathers (see photo DSCN0330 for gashes in dumpster). Photo DSCN0338 Outfall 1 where sample is collected (not discharging at time of photo). Outfall 002 (3.17 acres) gets the roof drains on main building and water from parking area after 1" flush catchment. According the SWPPP 3.1.3, Outfall 002 "includes storm water that overflows from the Outfall 002 'First Flush' Storm Water Containment Sump" as well as the Outdoor Materials and Equipment Storage Area, portions of the Empty DAF Trailer and Offal Trailer Parking area and roof drainage from southern portions of the Processing Plant" The first flush stormwater collection system "consists of underground storm sewer piping and a containment sump with a high-level activated pump which automatically turns on when fluid levels in the sump reach a certain height." After the first flush, the pump shuts off "and storm water is allowed to overflow the containment sump into drainage features" which flow to Outfall 002. Parking lot sheet flow goes to stormwater Outfall #2 via sheet flow at back of parking lot. First flush goes to wastewater, after that, flow goes to outfall via overflowing sump to storm drain grate surrounded by straw bales (photos DSCN0318 and DSCN0320) just down gradient, which travels to a pipe that discharges to the Flat Creek. Note there is nothing to keep this water from flowing as a sheet past this drain inlet. The facility is defining "first flush" as the first 30 minutes of a rain event. The pump was originally set to 30 minutes, then changed to 45 minutes, and it is now set to 60 minutes. For around the last year and half it has been set to 60 minutes. The pump must be manually reset after it runs for an hour. There is no log for when it is turned back on or when it is checked. Wastewater staff is responsible for turning it back on. The pump can handle 800 gallons per minute (photo 0317). A rain even of 1" or more will overflow the pump 2 basin to the straw bale inlet. Photo DSCN0332 standing liquid and flies above outfall 002 pump. Photo DSCN0339 and DSCN0340 condensate is discharging from outfall 2 (a daily base flow) at time of photo; site rep doesn't think condensate meets fecal benchmark. Outfall 003 (1.15 acres) has a pumping station that came online a few months ago; it is currently not in the SWPPP. Currently 100% goes to wastewater, but they might add a timer to capture only first flush. Photos 0306-0308. Photo 0309 materials stored uncovered outside. Photo 0310 uncovered dumpster. Photo 0311 uncovered bin with chicken pieces. The SWPPP Section 3.1.1 states that "water accumulated in this sump is typically pumped out every night via a Pilgrim's Pride Pump Truck and discharged to the onsite wastewater pretreatment system." The SWPPP needs updating to reflect current practice. <ul style="list-style-type: none"> SWPPP 7.3 "This SWP3 shall be revised within thirty (30) days whenever there is a change in design, Pollution and Spill Prevention & Response Team members, construction, operation or maintenance, which has a significant effect on the potential for the discharge of pollutants to waters of the State or Georgia, or if the SWP3 proves to be ineffective in eliminating or significantly minimizing pollutants from the sources identified herein, or in otherwise achieving the objectives of controlling pollutants in storm water discharges from industrial activities at the Facility." The site representative stated that the plant will "always have fecal above" in stream numbers. Summer fecal benchmark is 200 and winter is 1,000. In the past they have sampled upstream. The site map (Figure 2) does not clearly label discharges to the MS4 mentioned in the SWPPP 3.1.1. The drop inlet and storm sewer piping along Industrial Boulevard does not clearly indicate who owns the system.
Evidence of off-site accumulation of pollutants observed in receiving water			

Other discharges or potential discharges off-site (not through permitted outfalls)			Describe:
Non-stormwater discharge observed	X		Describe: Condensate <ul style="list-style-type: none"> • Permit 1.1.4 typical non-allowable non-storm water includes (b) vehicle and equipment washwater and (f) pavement wash water from containment zones • Permit 1.1.3 allowable non-storm water discharges (g) pavement wash waters where no detergent s are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed). (h) Routine external building washdown that does not use detergents

Additional inspection summary, narrative, findings, comments, photos, and schematic diagram of the facility area as necessary:

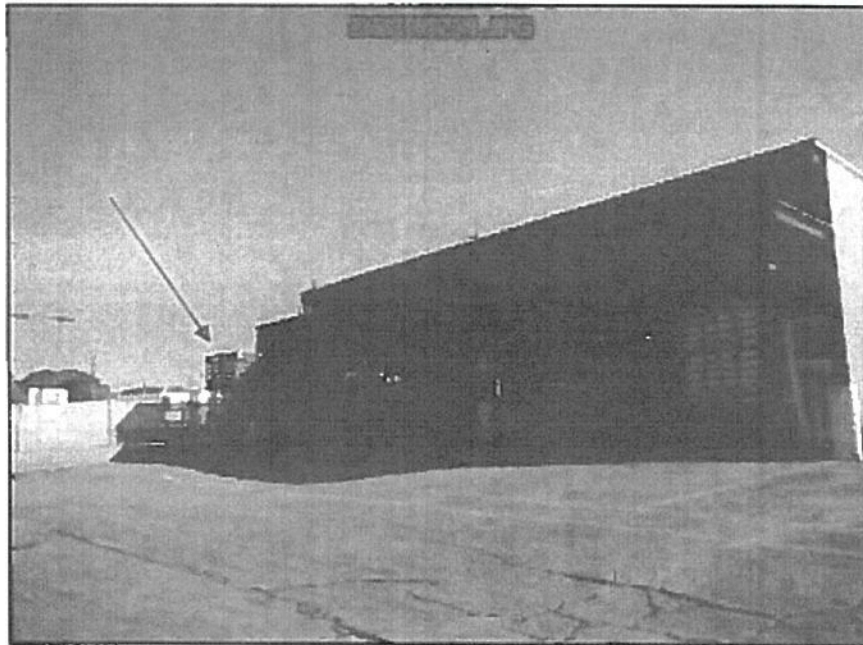
- No dye, smoke or equivalent test has been done for this permit cycle.
- Tanker trucks are used for sludge from the wastewater pretreatment facility.
- Inside the wastewater shed, the area is washed down daily, it is also "hopefully" dry picked up first (with a squeegee for chunks).
- Photo DSCN0283 evidence of past splatters and spills was observed on the ferric chloride tank inside the wastewater pre-treatment building (covered).
- When asked how they document 1st flush & how they know when discharge starts: Watches for 30 min after rain starts and wastewater operator goes to sample.
- Pilgrim's is working with the Georgia Poultry Association to look at fecal by species in Flat Creek (this is the planning stage).
- Pilgrim's is planning to add a collection tank and sump in the future.
- Pilgrim's plan for future fecal compliance is to collect 1.2" rain, up to 100%, this would be the 85th percentile rain event. The engineering report for this is not yet complete. They said they have 36 months from GA DNR's next letter to make these upgrades. They are planning on above ground stainless steel tanks. They would like to install these within one year. This process is being done at their Athen's facility. Ellijay and Carrollton are also on impaired streams and may move in this direction as well.
- SWPPP 1.2.e. "The concrete wall at the Live Haul Trailer and Cage Storage Area (east of Loaded Refrigerated Trailer Parking Area) shall be modified to prevent refrigerated trailers from backing over it. This modification should include installing a sign stating drivers shall not back refrigerated trailers over the wall, as well as installing a chain between posts over the wall, installing metal bars in the top of the wall or pouring additional concrete on the wall to raise the wall height." Modification was not observed (photo DSCN0290).

Exit interview conducted with: Facility: Stephen James • •
 Exit interview conducted with: Facility: Stephen James

DSCN0236.JPG

Live Receiving Shed Containment Zone, designed for "complete capture." Note that a loaded trailer is parked beyond the covered area. This housekeeping issue is a potential source for contaminated stormwater runoff.

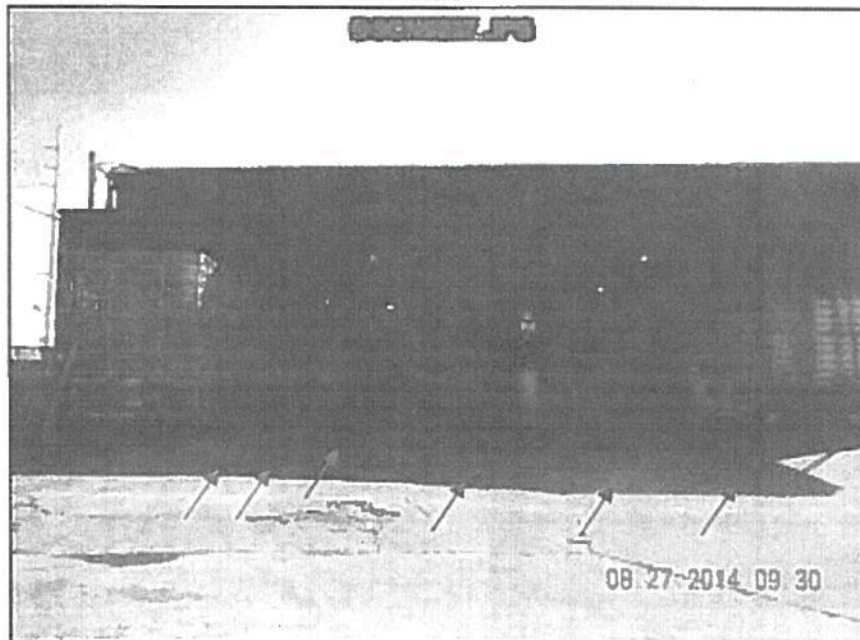
Title:



DSCN0237.JPG

Live Receiving Shed Containment Zone – note the feathers and manure on the uncovered ground. This housekeeping issue is a potential source for contaminated stormwater runoff.

Title:



DSCN0238.JPG

Near the Live Receiving Shed Containment Zone- note the debris and feathers on the ground. This housekeeping issue is a potential source for contaminated stormwater runoff.

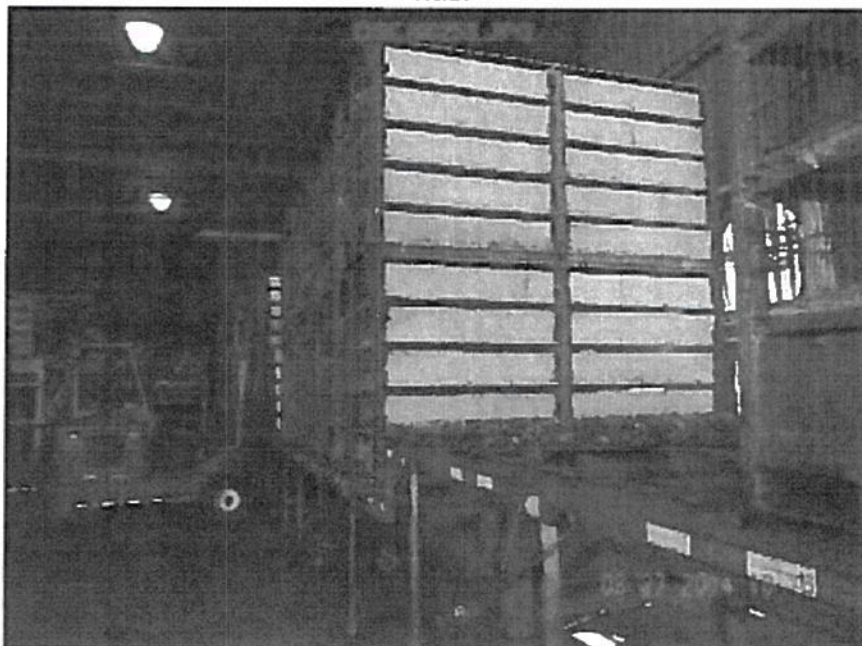
Title:



DSCN0253.JPG

Live Receiving Shed Containment Zone- note manure on sides of cages.

Title:



DSCN0255.JPG

Live Receiving Shed Containment Zone.

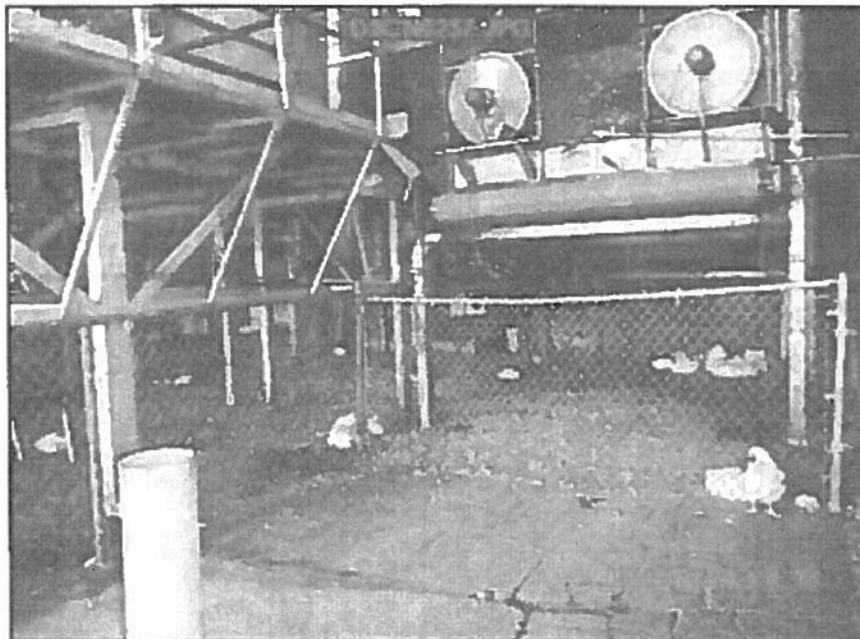
Title:



DSCN0257.JPG

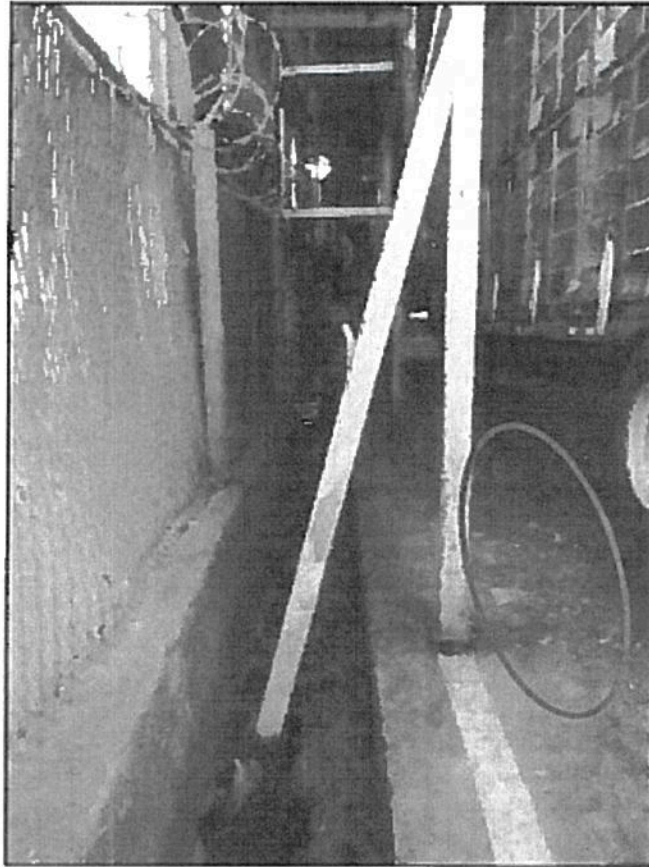
Live Receiving Shed Containment Zone.

Title:



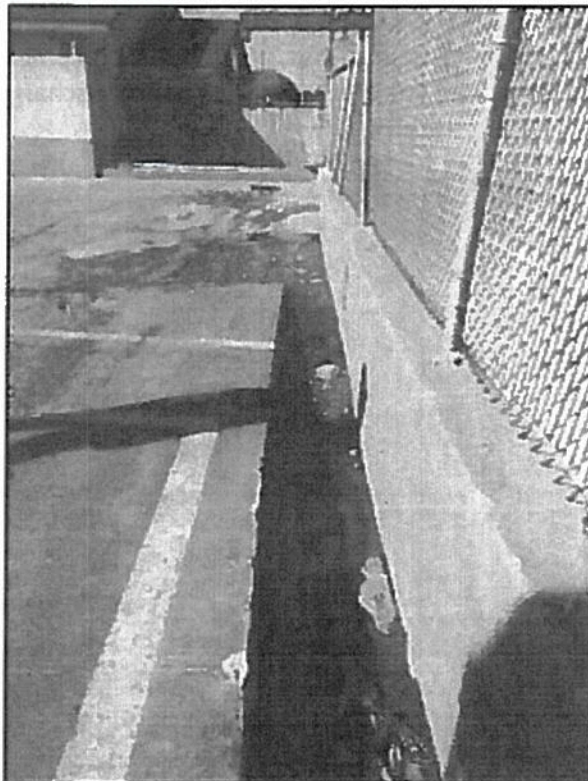
DSCN0259.JPG

Live Receiving Shed Containment Zone- gutter along side covered area which leads down gradient to uncovered area in photograph DSCN0260. Note manure and feathers on the ground.



DSCN0260.JPG

Near the Live Receiving Shed Containment Zone – note debris in gutter and depression. The map indicates there is a collection sump in this area leading to wastewater pre-treatment, however the SWPPP is not clear regarding whether a control feature exists in this area.



DSCN0261.JPG

Near the Live Receiving Shed Containment Zone – note debris, including trash and feathers (inadequate housekeeping)

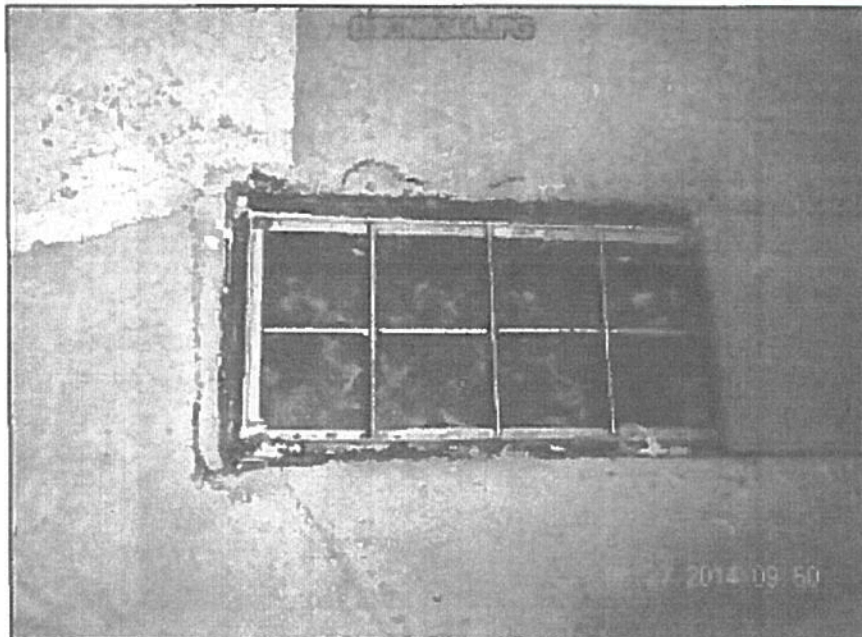
Title:



DSCN0244.JPG

Large chicken parts (e.g., legs) were observed being dumped into the lines leading to the pretreatment system. SWPPP 4.1.2.2 "To the extent practical, large debris (tubs, boxes, etc.), equipment (tools, etc.), significant oily/fat material and other materials that may cause line blockages shall not be discharged to wastewater collection and pretreatment systems."

Title:



DSCN0248.JPG

Grate that leads to pre-treatment system inside processing building.

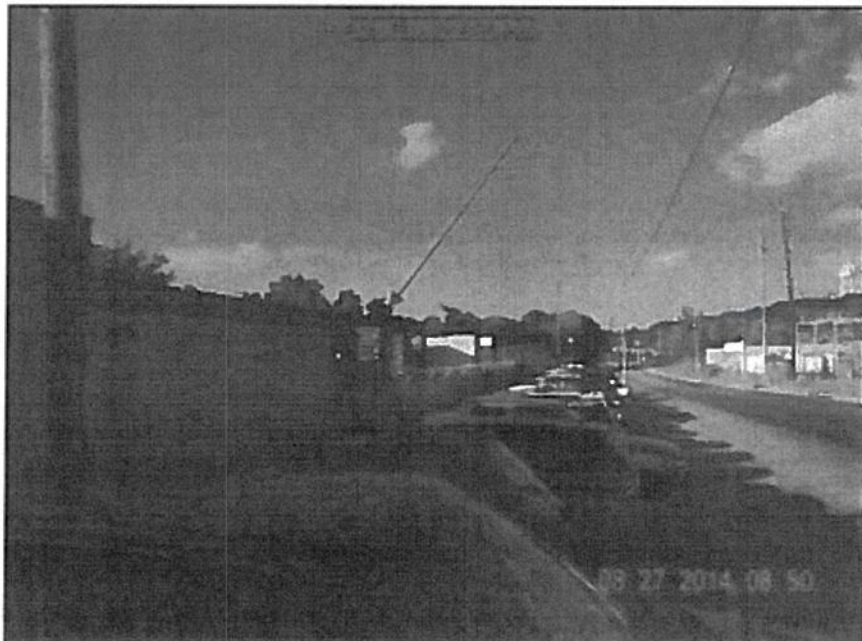
Title:



DSCN0227.JPG

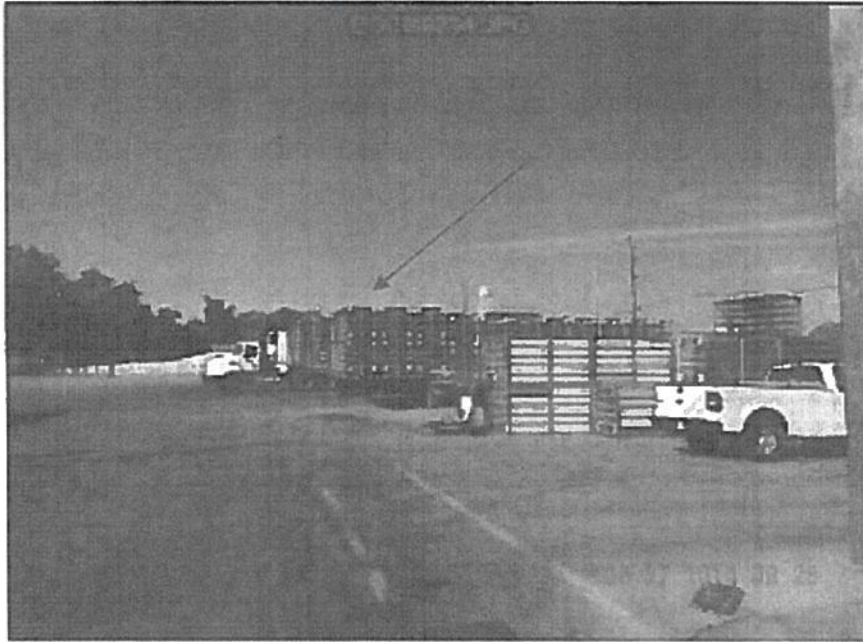
Cage truck with chickens parked is in an uncovered area (Loaded Refrigerator Trailer Parking Area/ Live Haul Trailer and Cage Storage Area). Table 6 Site Improvements and BMP Additions, 3/11/13, applies to the Live Holding Shed Containment Zone. The described improvement is moving all unwashed trailers and cages to this area or other areas that drain to wastewater. This improvement is not being adhered to (Permit 5), when unwashed trailers and cages are parked in the Loaded Refrigerator Trailer Parking Area/ Live Haul Trailer and Cage Storage Area.

Title:



DSCN0234.JPG

Multiple cage trucks parked in Loaded Refrigerator Trailer Parking Area (uncovered).
Title:

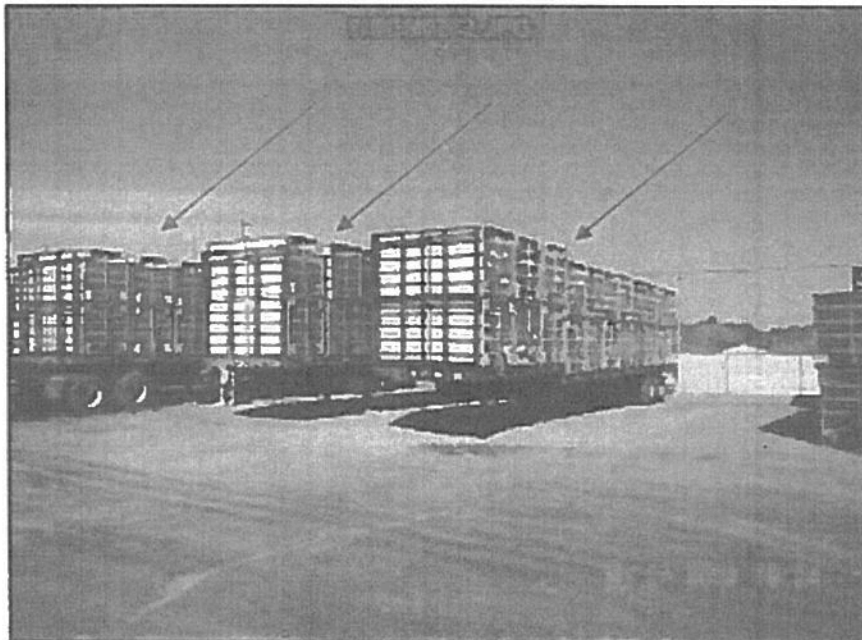


DSCN0262.JPG

Multiple cage trucks parked uncovered in Live Haul Trailer and Cage Storage Area, next to the Loaded Refrigerated Trailer Parking Area.

SWPPP 4.1.1 "Live Haul, Offal and DAF Skimmings Trailers shall not be parked in areas outside of Containment Zones unless washed down/cleaned of possible pollutants (poultry litter, offal tracking, etc.) and leakage of trailers is not possible, as applicable." The Live Haul Trailer and Cage Storage Area is not a designated Containment Zone.

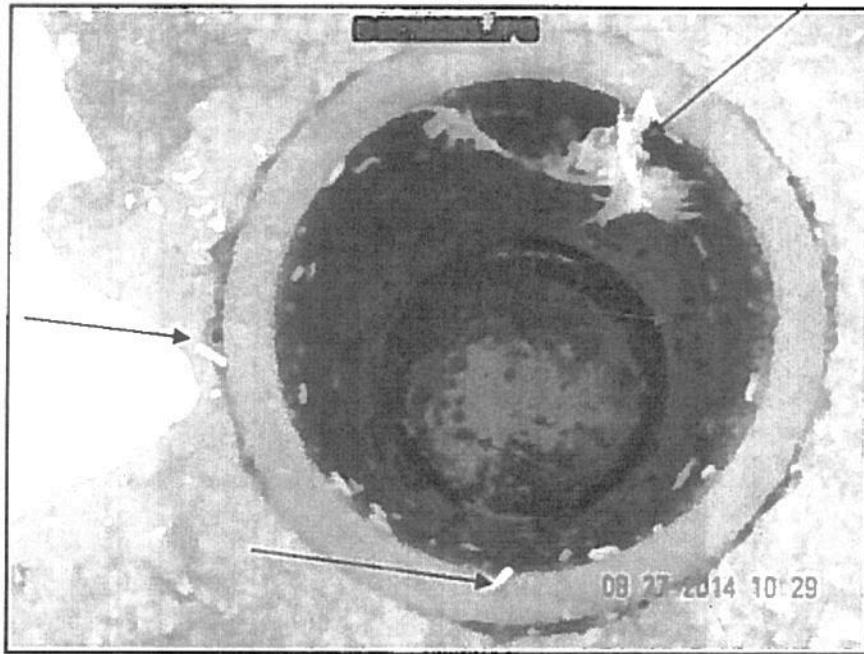
Title:



DSCN0265.JPG

Maggots on pipe wall and liquid in pipe in Loaded Refrigerated Trailer Parking Area. Feathers on the ground.

Title:



DSCN0288.JPG

After EPA inspectors asked about maggots in these pipes, disinfectant was applied.

SWPPP 4.1.2.1 "Disinfection (i.e., application of sodium hypochlorite solution, etc.) to ground surfaces in live animal holding, staging, and transfer areas, offal handling areas and other applicable areas onsite, if any, only occurs during dry weather (i.e., when rain is not forecast within the next 24 hours at a 30 percent or higher change) and is applied in a manner such that there is no discharge to storm water drainage features as a result of the application."

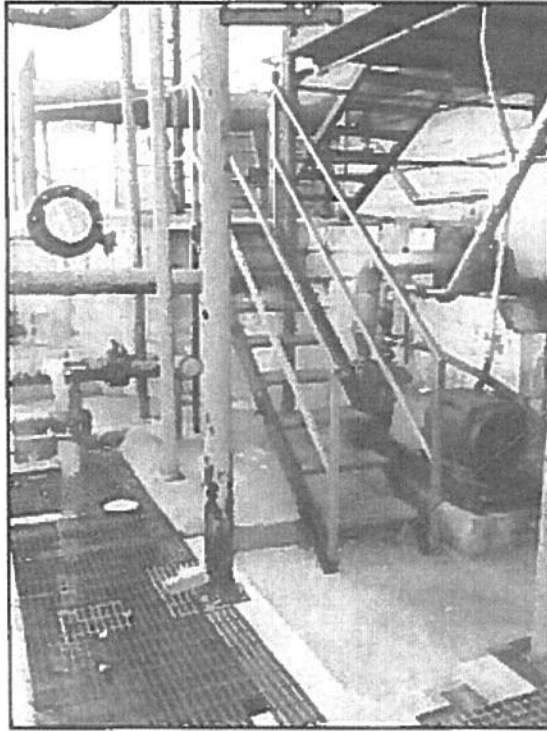
Title:



DSCN0270.JPG

Feathers on ground outdoors near pre-treatment.

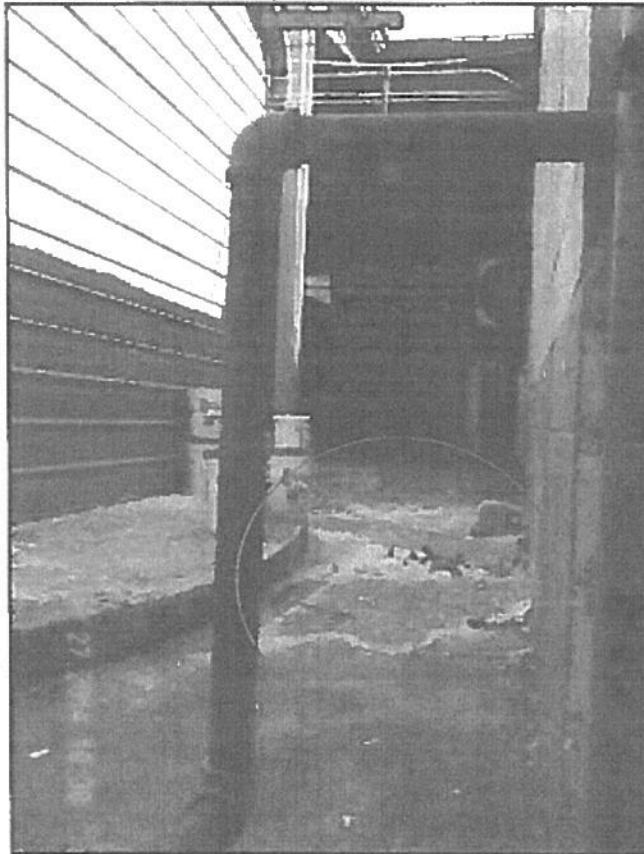
Title:



DSCN0271.JPG

A large quantity of feathers on ground near pre-treatment and Live Holding Shed Containment Zone; this creates a potential source of contamination for stormwater runoff.

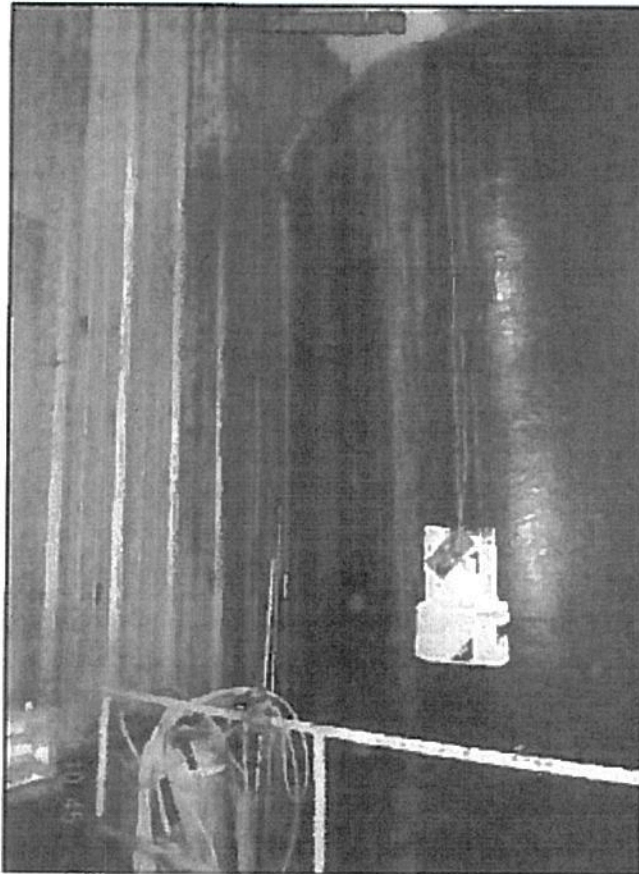
SWPPP 4.1.1 "Clean-up of the Live Holding Shed, Containment Zones, scale area, cage storage areas, etc. and other outdoor areas where manure, dirt, dust, feathers, etc. from Live Haul/Receiving operations may accumulate, shall be performed on a routine basis."



DSCN0282.JPG

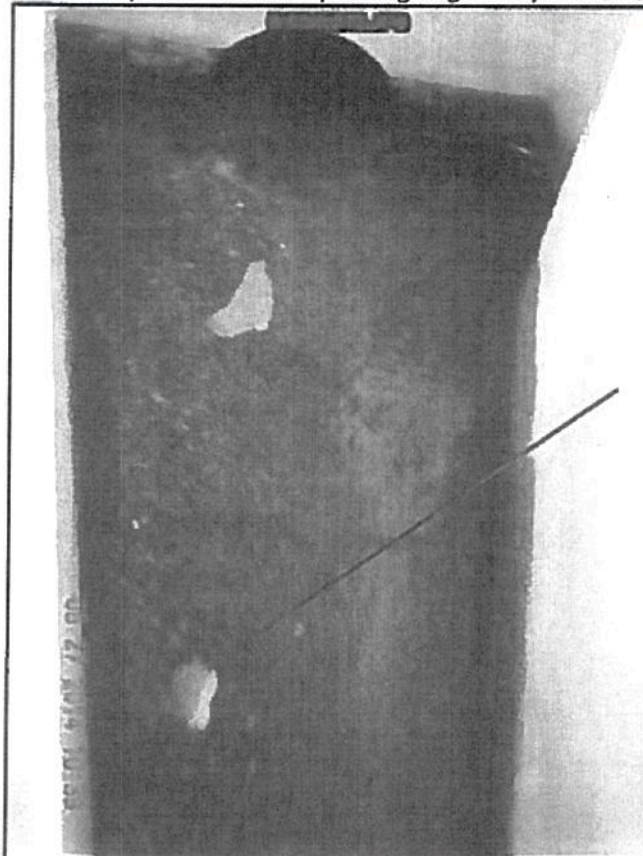
Evidence of past splatters and spills was observed on the ferric chloride tank inside the wastewater pre-treatment building (covered).

Title:



DSCN0272.JPG

Fats in flume from pre-treatment system going to city treatment system.



DSCN0274.JPG

Fats in flume from pre-treatment system going to city treatment system.

Title:



DSCN0275.JPG

Loose feathers on ground near pre-treatment and behind Cage Repair Shed.

SWPPP 4.1.1 "Clean-up of the Live Holding Shed, Containment Zones, scale area, cage storage areas, etc. and toehr outdoor areas where manure, dirt, dust, feathers, etc. from Live Haul/Receiving operations may accumulate, shall be performed on a routine basis."

Title:

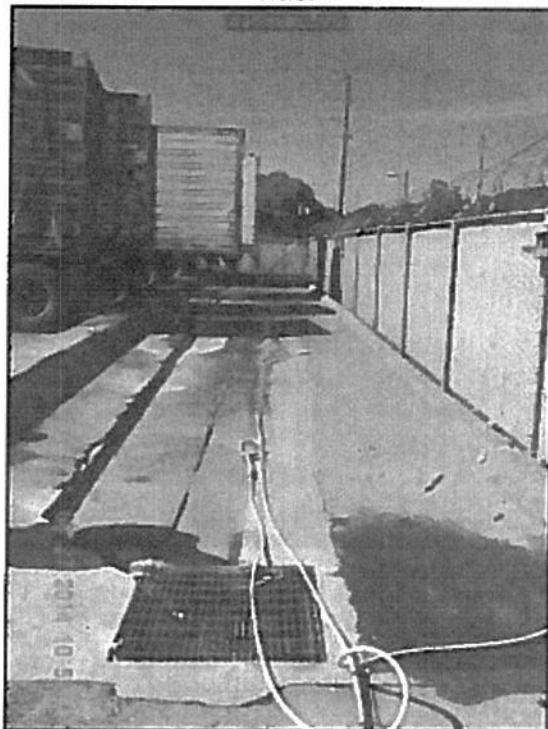


DSCN0290.JPG

Disinfectant foam on the ground (containment zone behind Loaded Refrigerated Trailer Parking Area). Red Water Drainage through the Containment Zone is designed for "complete capture." The area "consists of a concrete curbed area to capture "red water" drainage from loaded refrigerated trailers parked in the area. Collected water in the trough gravity flows to a drop inlet where it is conveyed to the wastewater pretreatment system."

Note empty cages stored on trailers in a non-containment zone (Live Haul Trailer and Cage Storage Area). SWPPP 4.1.1 "Empty cages with significant poultry manure residues should be stored in Containment Zones." The Live Haul Trailer & Cage Storage Area is not a designated Containment Zone.

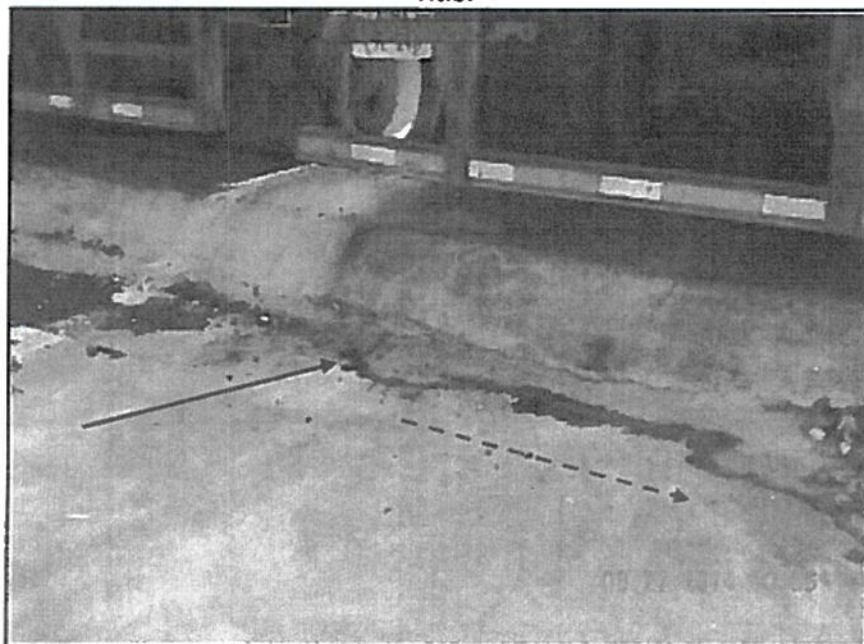
Title:



DSCN0292.JPG

Note blood/redwater on ground from refrigerated trailer in the containment zone behind the Loaded Refrigerated Trailer Parking area. The inlet to the pre-treatment system is located on the left side of this photo, however the material is flowing to the right due to the slope going in the wrong direction, creating the potential for contamination to escape to stormwater.

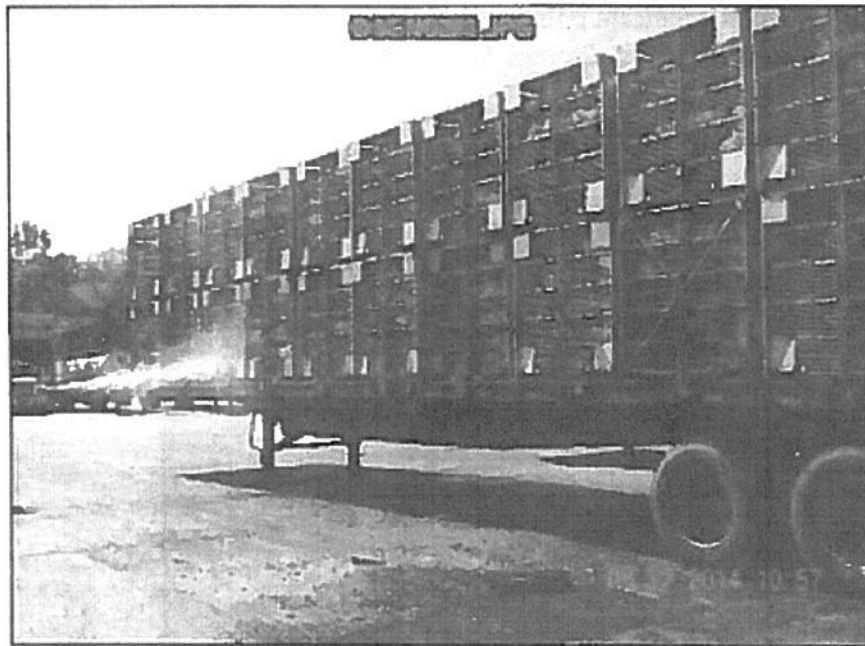
Title:



DSCN0293.JPG

Loaded chicken trailer parked in uncovered Live Haul Trailer and Cage Storage Area/Loaded Refrigerated Trailer Parking Area. Chickens were sprayed with water multiple times during the inspection to keep them cool. The water on the ground is from this process.

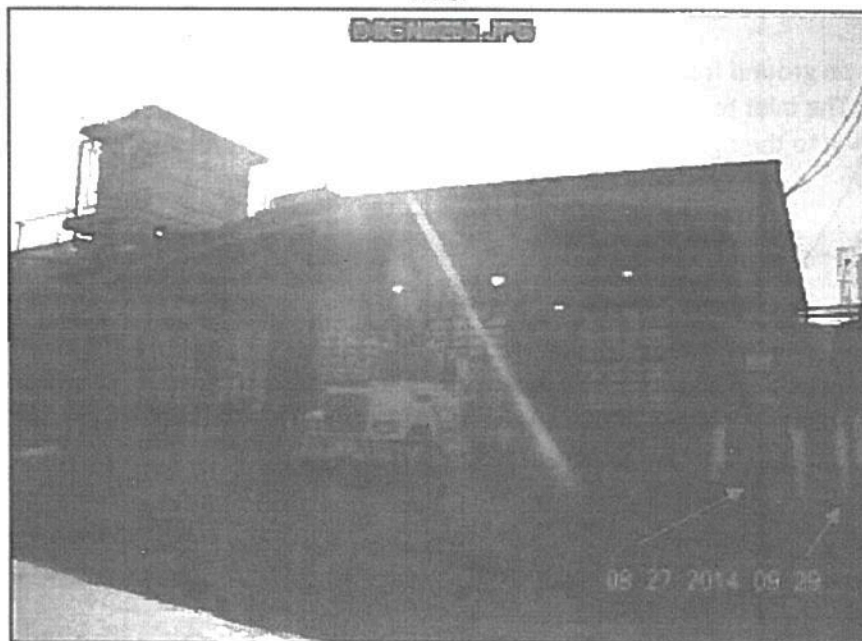
Title:



DSCN0235.JPG

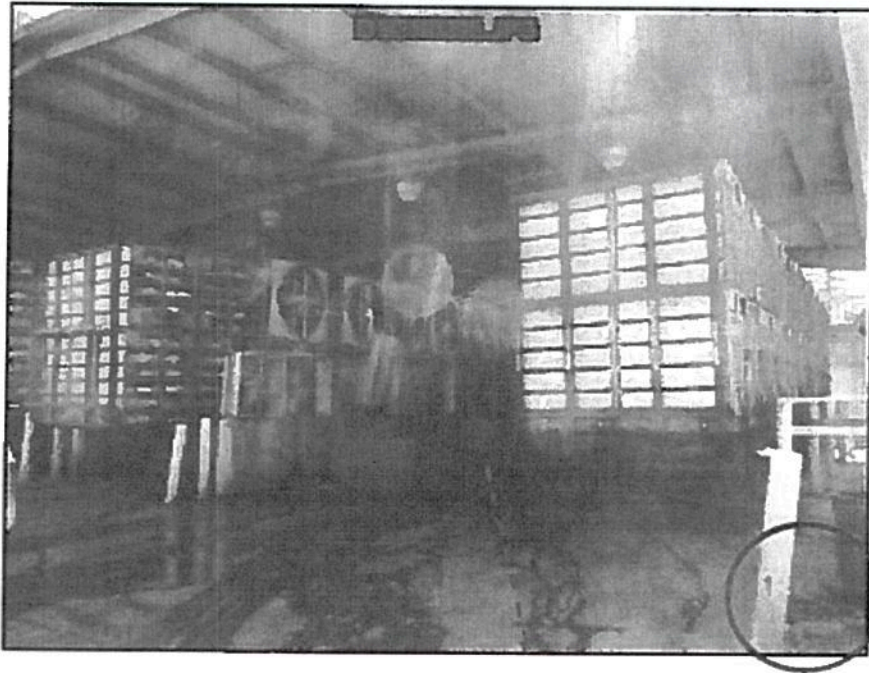
Live Holding Shed Containment Zone, designed for "complete capture." Note feathers on the ground outside of containment zone.

Title:



Runoff from covered Live Holding Shed Containment Zone, designed for "complete capture." Note runoff from inside the shed to outside the shed and chicken debris on the ground.

Title:



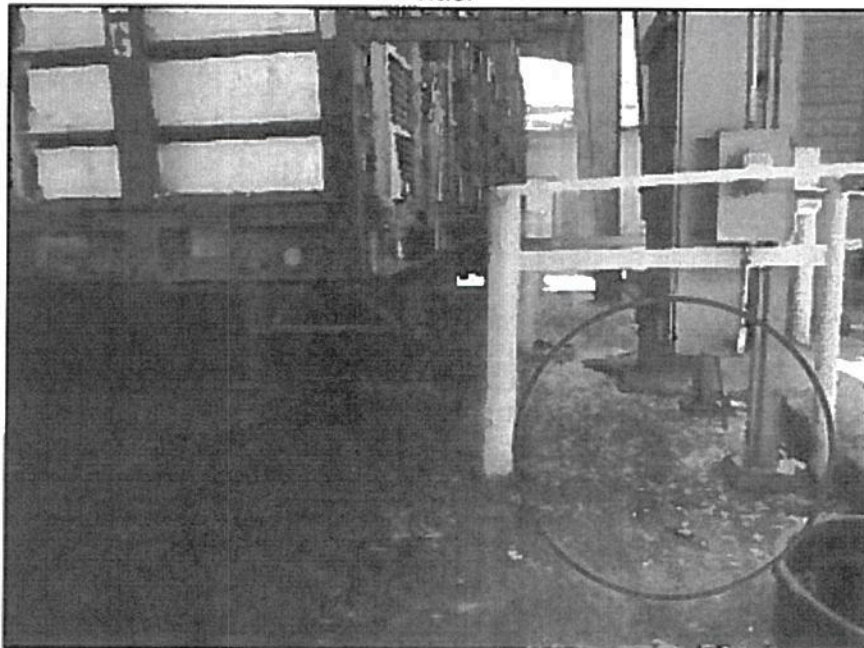
DSCN0296.JPG

Chicken debris on the ground in the Live Holding Shed Containment Zone, designed for "complete capture." This large accumulation of debris is a housekeeping issue. The area is not functioning as a complete capture area.

SWPPP 4.1.1 "Clean-up of the Live Holding Shed, Containment Zones, scale area, cage storage areas, etc. and other outdoor areas where manure, dirt, dust, feathers, etc. from Live Haul/Receiving operations may accumulate, shall be performed on a routine basis."

SWPPP 4.1.2.1 "Perform routing dry clean-up of live animal holding and handling Containment Zones at the Facility to prevent excessive accumulations of feathers, dusts and other debris that may contribute to excessive fugitive dust emissions from Facility."

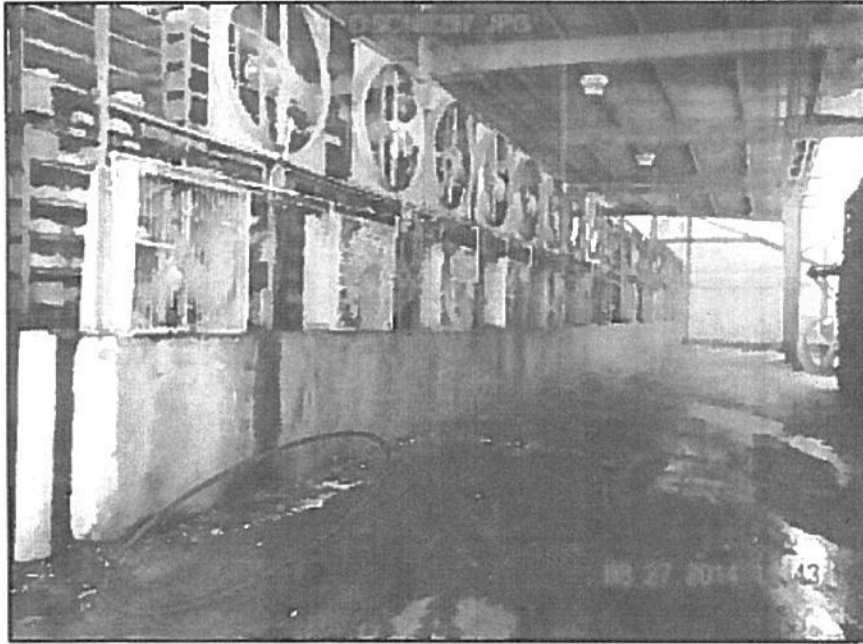
Title:



DSCN0297.JPG

Feathers on the ground in the Live Holding Shed Containment Zone, designed for "complete capture."

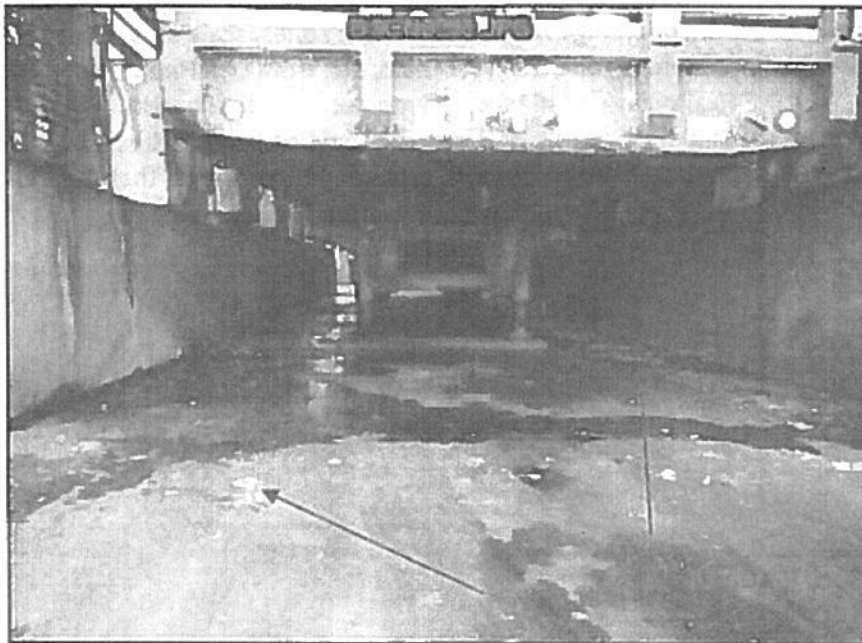
Title:



DSCN0298.JPG

Live Holding Shed Containment Zone, designed for "complete capture." Note feathers and manure on the ground.

Title:



DSCN0299.JPG

Contaminated rinse water from covered Live Holding Shed Containment Zone, designed for "complete capture" is escaping from the shed and entering the parking lot, meaning that this area is not adequately designed for complete capture. The area with loaded chicken trailers has runoff into the Loaded Refrigerator Trailer Parking Area where stormwater drains via sheet flow to Outfall 002.

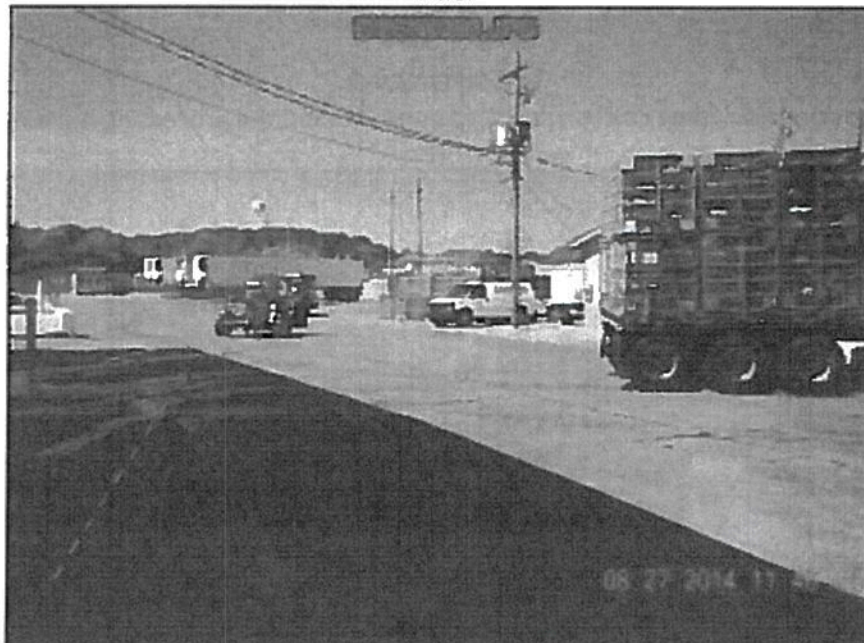
Title:



DSCN0300.JPG

Photo taken from near the Live Holding Shed Containment Zone, designed for "complete capture."

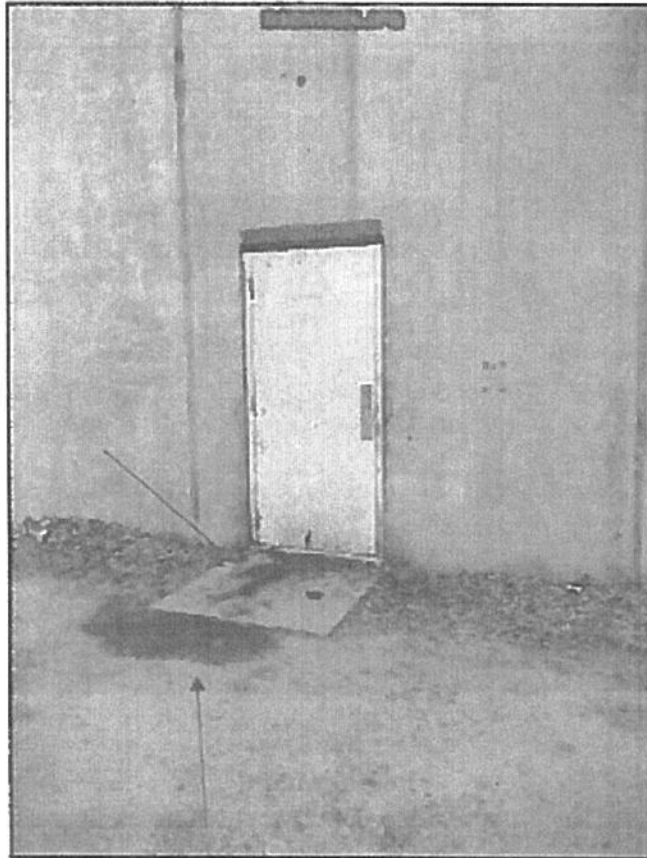
Title:



DSCN0304.JPG

Tracking (including chicken parts) to outside beind the processing building.

Title:



DSCN0305.JPG

Tracking (including chicken parts) to outside beind the processing building.

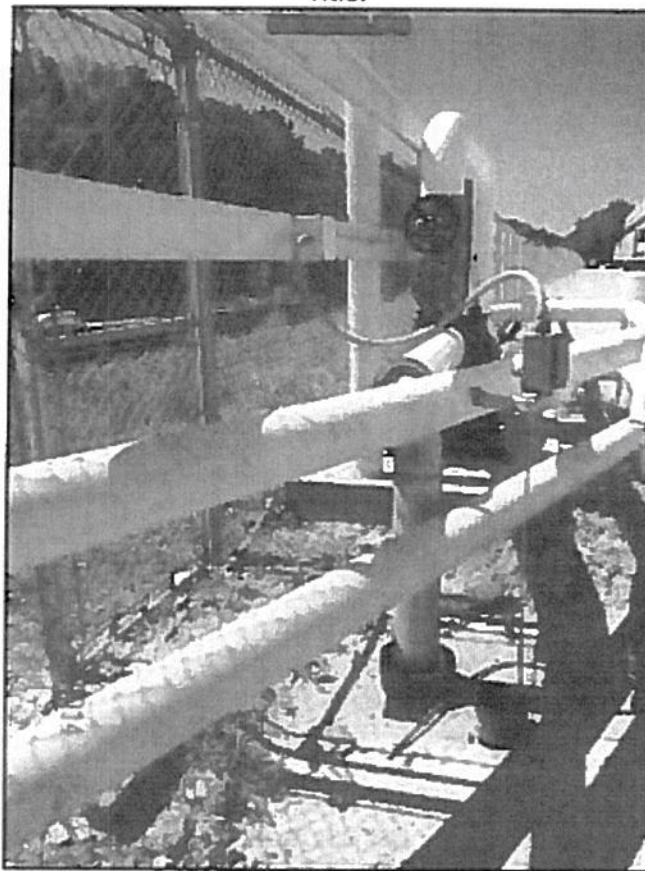
Title:



DSCN0308.JPG

Outfall 003

Title:



DSCN0310.JPG

Uncovered roll off and uncovered push bin.

SWPPP 4.1.2.8 Trash Compactors, Roll Off Boxes, and Bins "Lids, covers, tarps, etc. shall be maintained on solid waste roll off boxes and other onsite waste receptacles containing solid waste onsite except when in active use to prevent the entry and release of rainwater."

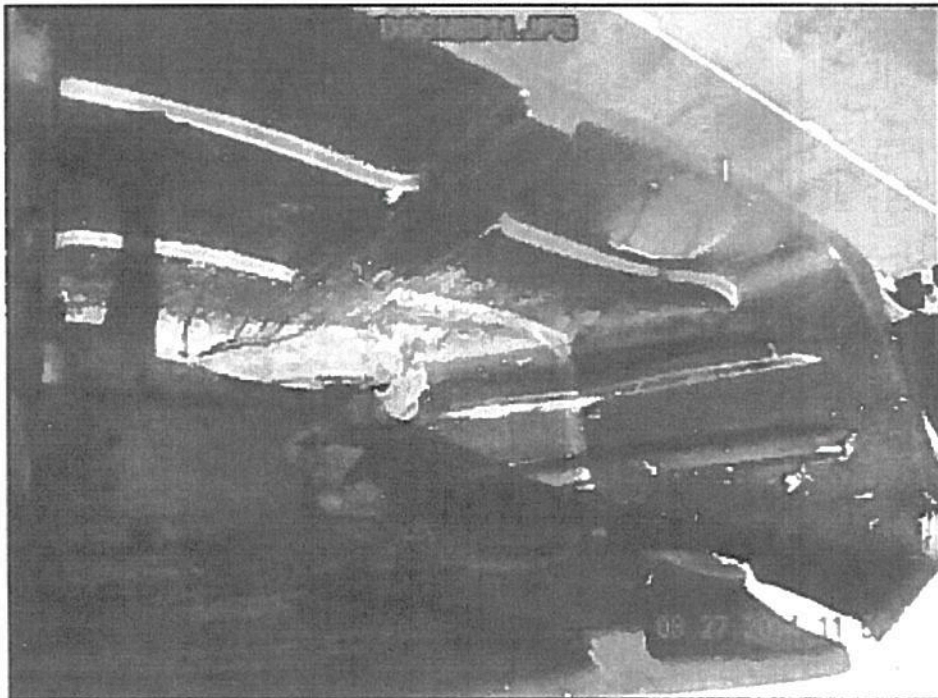
Title:



DSCN0311.JPG

The uncovered pushbin contained chicken parts.

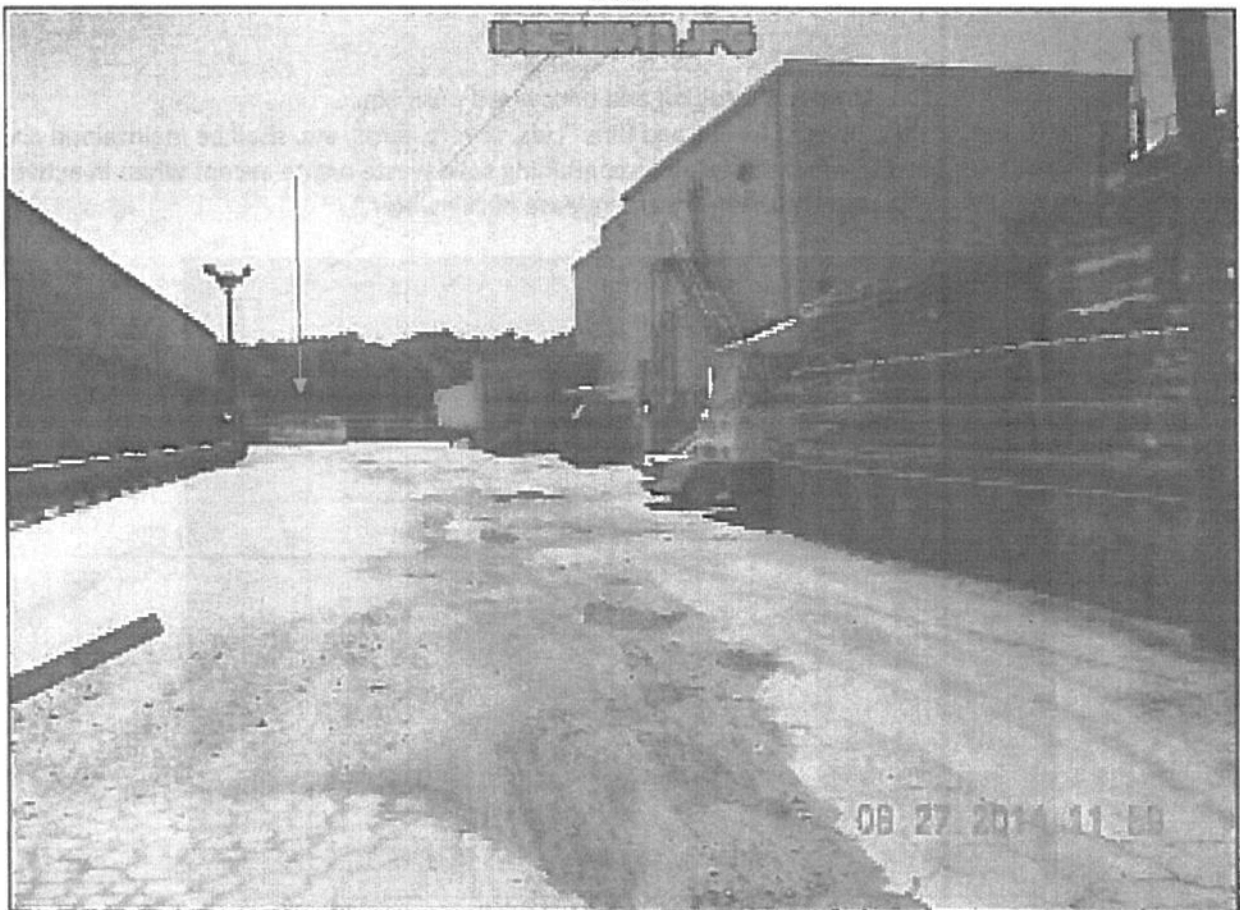
Title:



DSCN0313.JPG

Outfall 003. Sediment accumulation on driveway is a potential source for TSS.

Title:



DSCN0314.JPG

East Side Shipping Dock Containment Zone designed for "complete capture". SWPPP 3.1.2.7 "Two (2) process sewer drop inlets are installed in the area to collect 'red water' water drainage from refrigerated trailers and wash down water from the area."

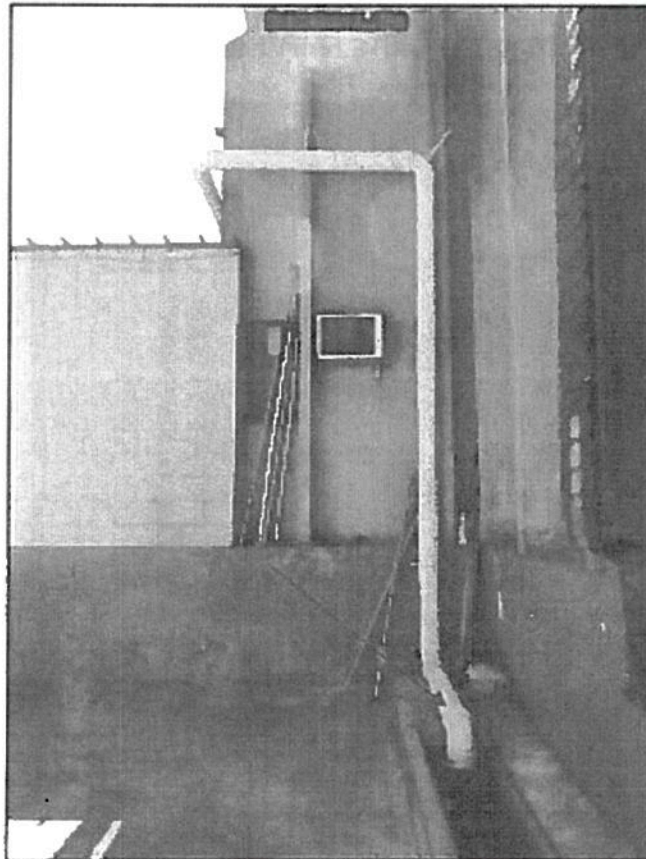
Title:



DSCN0315.JPG

Photo DSCN0315 Pipe from cooling tower not listed in #7 as part of source. Clarification is needed regarding the final destination of this source. The map indicated it's a containment zone, which should go to wastewater pretreatment, however the map also indicated "DI" for drop inlet and storm sewer piping.

Title:



DSCN0316.JPG

Trailer with blood on the exterior parked uncovered outdoors.

CBMPPP 4.1.1 "Equipment and vehicles, including Live Haul trailers, offal trailers, DAF skimmings trailers, refrigerated trailers, forklifts, etc. stored in outdoor areas outside Containment Zones shall be kept clean and free of excessive amounts of dirt, debris, poultry litter, oil/grease, etc."

SWPPP 4.1.1 "Live Haul, Offal and DAF Skimmings Trailers shall not be parked in areas outside of Containment Zones unless washed down/cleaned of possible pollutants (poultry litter, offal tracking, etc.) and leakage of trailers is not possible, as applicable."

Title:



DSCN0331.JPG

Truck scale (rear center), Offal Trailer Storage Area Containment Zone (rear to the right of the scale) designed for "first flush", and Outfall 002 "First Flush" Storm Water Containment Sump (front center).

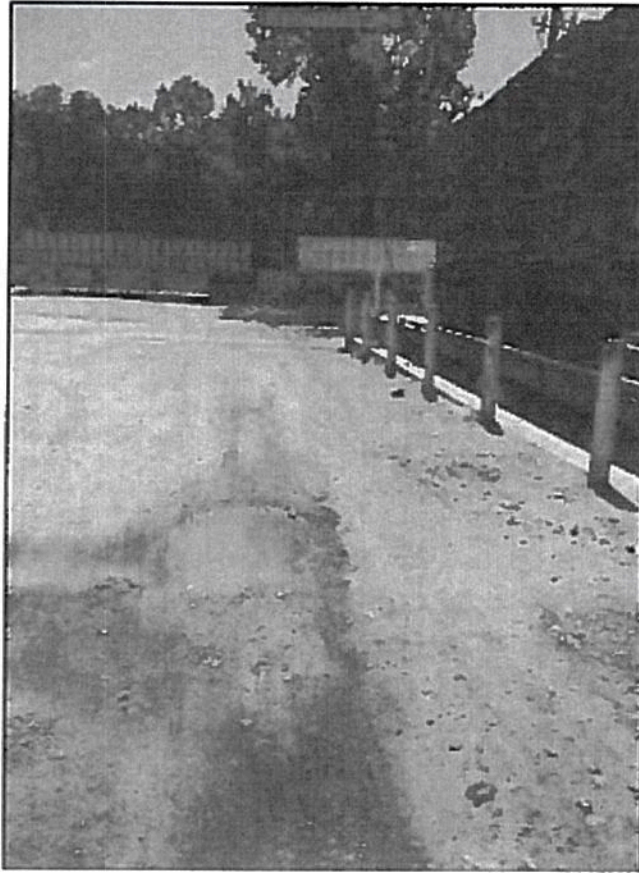
Title:



DSCN0332.JPG

Standing liquid and flies above outfall 002 pump, next to truck scale.

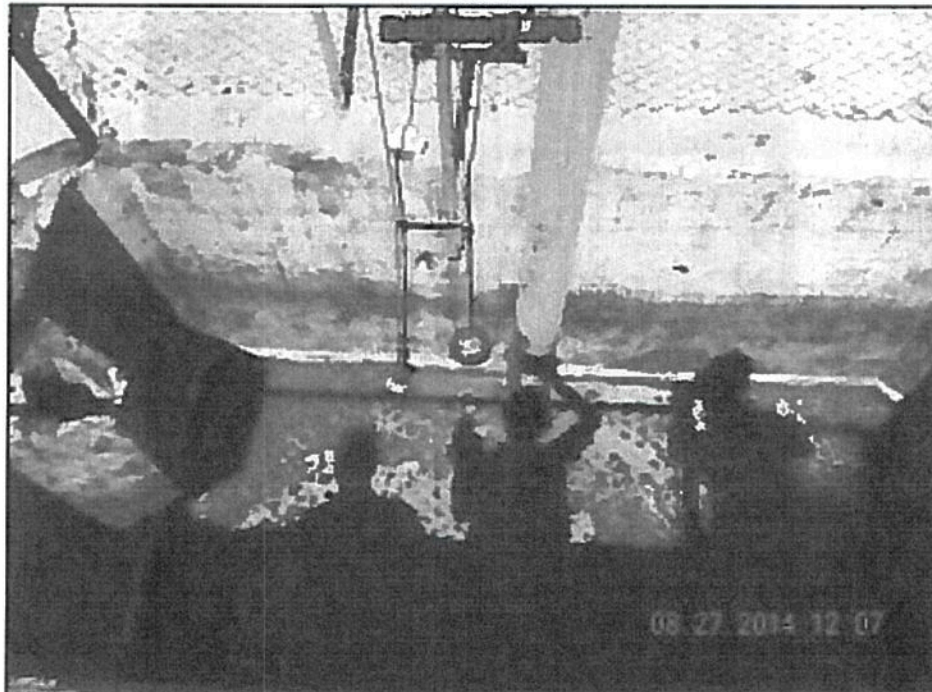
Title:



DSCN0317.JPG

Outfall 002 "First Flush" Storm Water Containment Sump

Title:



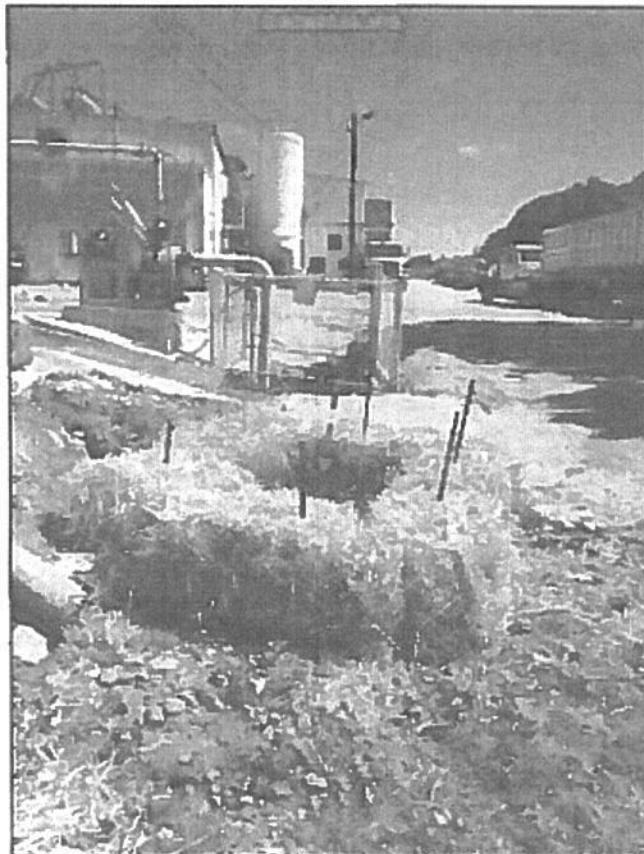
DSCN0318.JPG

Outfall 002 "First Flush" Storm Water Containment Sump
Title:



DSCN0320.JPG

To Outfall 002
Title:



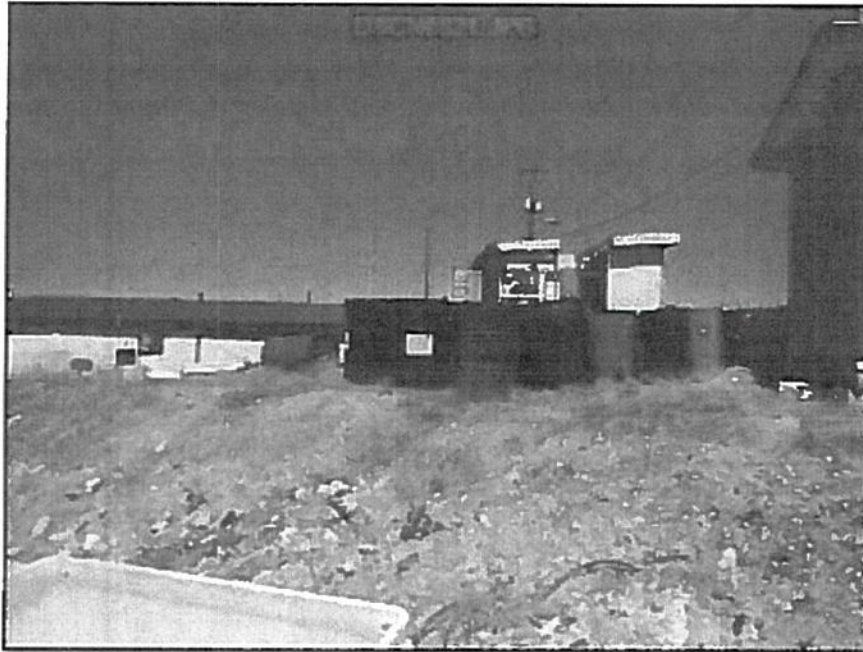
DSCN0321.JPG

Drums stored uncovered outdoors.

CBMPPP 4.1.1 "Empty drums shall be routinely sent offsite for disposal/recycling."

CBMPPP 4.1.1 "Adequate vegetation and rip/rap materials shall be maintained in areas subject to excessive sedimentation and erosion (i.e. unpaved areas, drainage ditches, etc.)."

Title:



DSCN0322.JPG

Open containers stored uncovered outdoors. Note trash on the ground.

SWPPP 4.1.2.5 Outdoor Materials and Equipment Storage Areas "No open drums or other open containers shall be stored in these areas."

Title:



DSCN0323.JPG

Area lacks vegetation to stabilize slopes. Uncovered roll offs. Metal items in uncovered roll off had feathers on them.

CBMPPP 4.1.1 "Adequate vegetation and rip/rap materials shall be maintained in areas subject to excessive sedimentation and erosion (i.e. unpaved areas, drainage ditches, etc.)."

SWPPP 4.1.2.8 Trash Compactors, Roll Off Boxes, and Bins "Lids, covers, tarps, etc. shall be maintained on solid waste roll off boxes and other onsite waste receptacles containing solid waste onsite except when in active use to prevent the entry and release of rainwater."

SWPPP 4.1.2.8 Trash Compactors, Roll Off Boxes, and Bins "Ensure scrap cage parts stored in the Cage Parts Bin are cleaned of excessive poultry litter, feathers, etc. prior to being transferred to scrap metal bins."

Title:



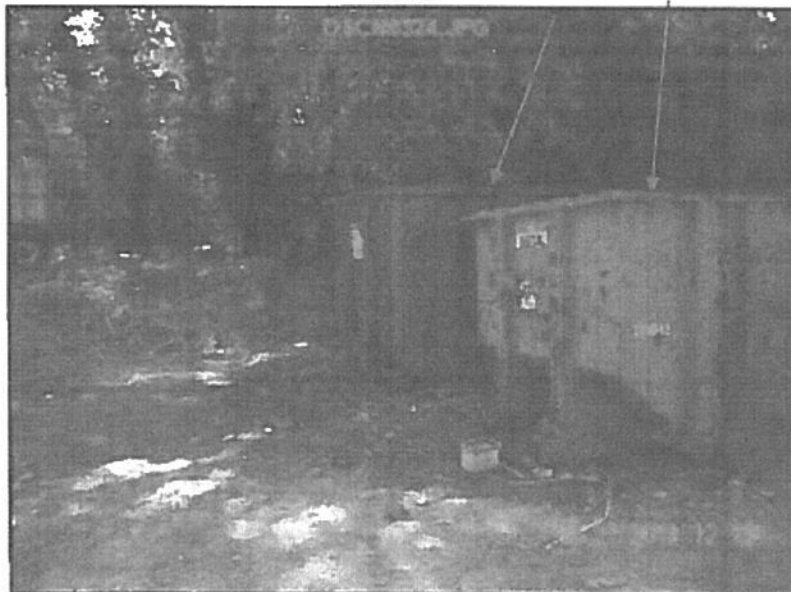
DSCN0324.JPG

Uncovered dumpsters with holes in the bottom. Scrap Metal Bins & Solid Waste Roll Off Box (To Be Covered), according to SWPPP map. Note trash on ground.

SWPPP 4.1.2.8 Trash Compactors, Roll Off Boxes, and Bins "Lids, covers, tarps, etc. shall be maintained on solid waste roll off boxes and other onsite waste receptacles containing solid waste onsite except when in active use to prevent the entry and release of rainwater."

SWPPP 4.1.2.8 Trash Compactors, Roll Off Boxes, and Bins "Ensure scrap cage parts stored in the Cage Parts Bin are cleaned of excessive poultry litter, feathers, etc. prior to being transferred to scrap metal bins."

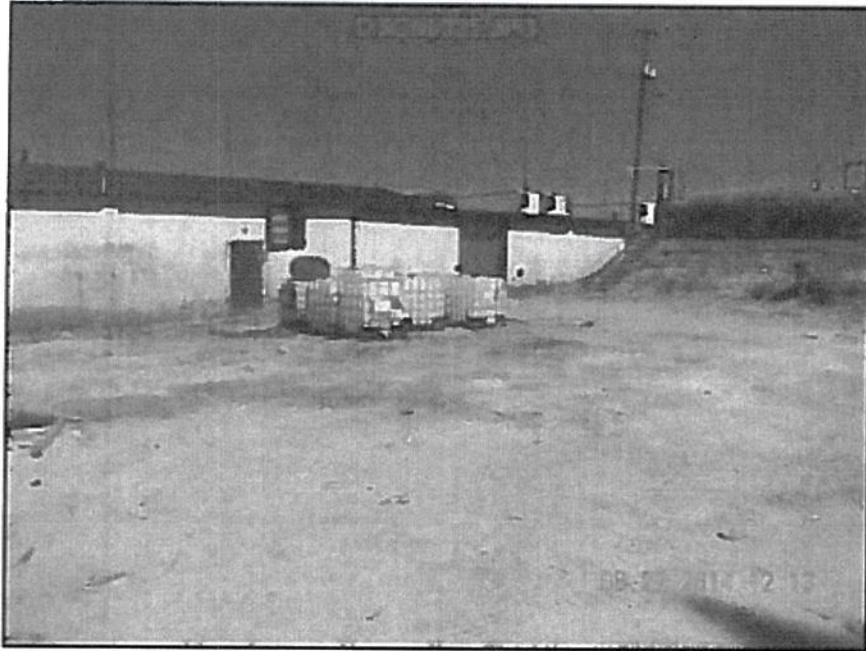
Title:



DSCN0325.JPG

Material storage uncovered outdoors.

Title:



DSCN0326.JPG

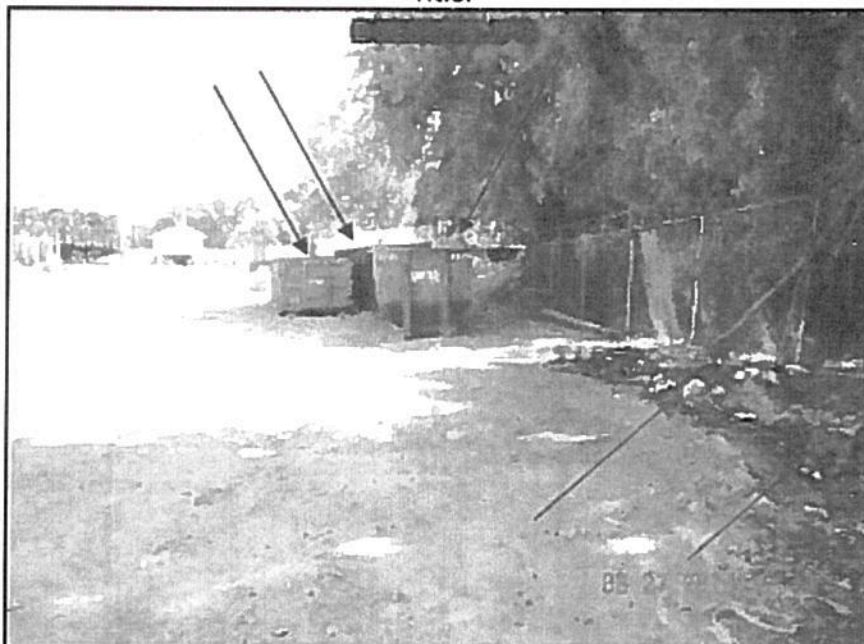
Scrap Metal Bins & Solid Waste Roll Off Box (To Be Covered), according to SWPPP map. Note trash on the ground accumulated along downgradient fenceline. This area appears to be receiving sheet flow.

SWPPP 4.1.2.8 Trash Compactors, Roll Off Boxes, and Bins "Lids, covers, tarps, etc. shall be maintained on solid waste roll off boxes and other onsite waste receptacles containing solid waste onsite except when in active use to prevent the entry and release of rainwater."

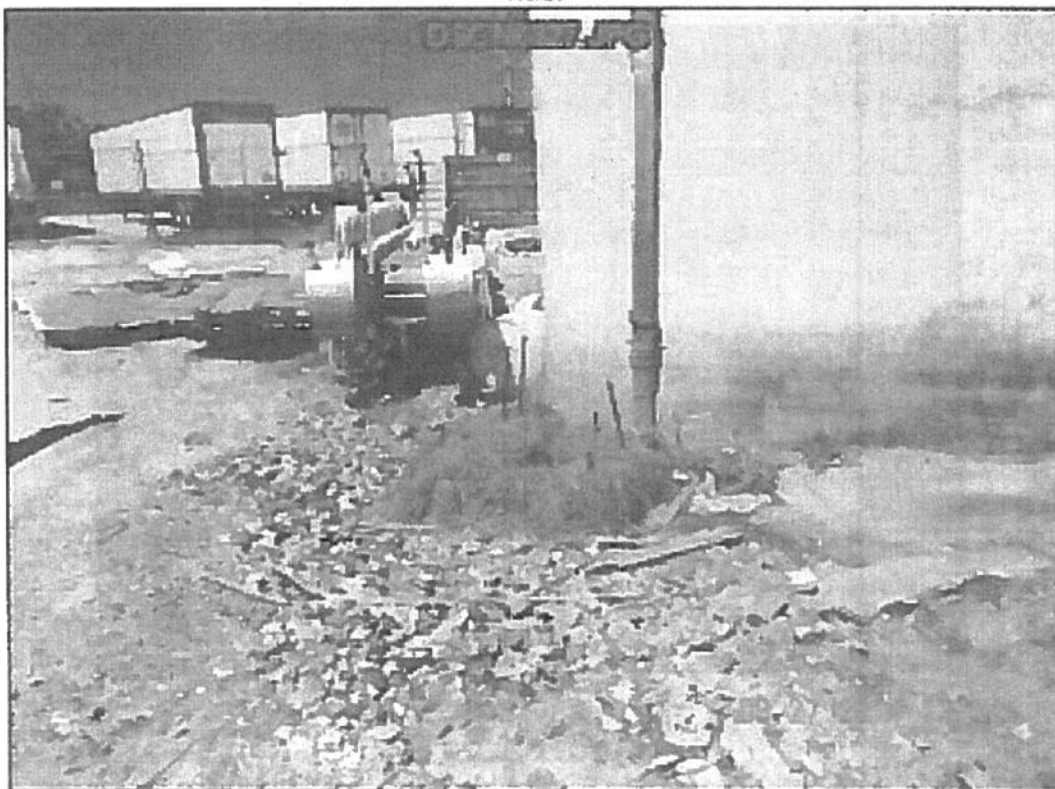
SWPPP 4.1.2.8 Trash Compactors, Roll Off Boxes, and Bins "Ensure scrap cage parts stored in the Cage Parts Bin are cleaned of excessive poultry litter, feathers, etc. prior to being transferred to scrap metal bins."

SWPPP 4.1.1 "Regularly pickup/clean-up and properly dispose of solid waste materials that may collect around the Site."

Title:



DSCN0327.JPG
Inlet to Outfall 001
Title:



DSCN0329.JPG

Materials stored uncovered outdoors. Inlet to Outfall 001.

SWPPP 4.1.2.5 Outdoor Materials and Equipment Storage Areas "Areas where equipment and materials, including pallets, metal and scrap cardboard, are stored outdoors shall be maintained in a neat and orderly manner."

Title:



DSCN0330.JPG

Holes in roll off, allowing the escape of stormwater.

Title:



DSCN0333.JPG

Feathers and debris collecting at storm drain inlet along the street.

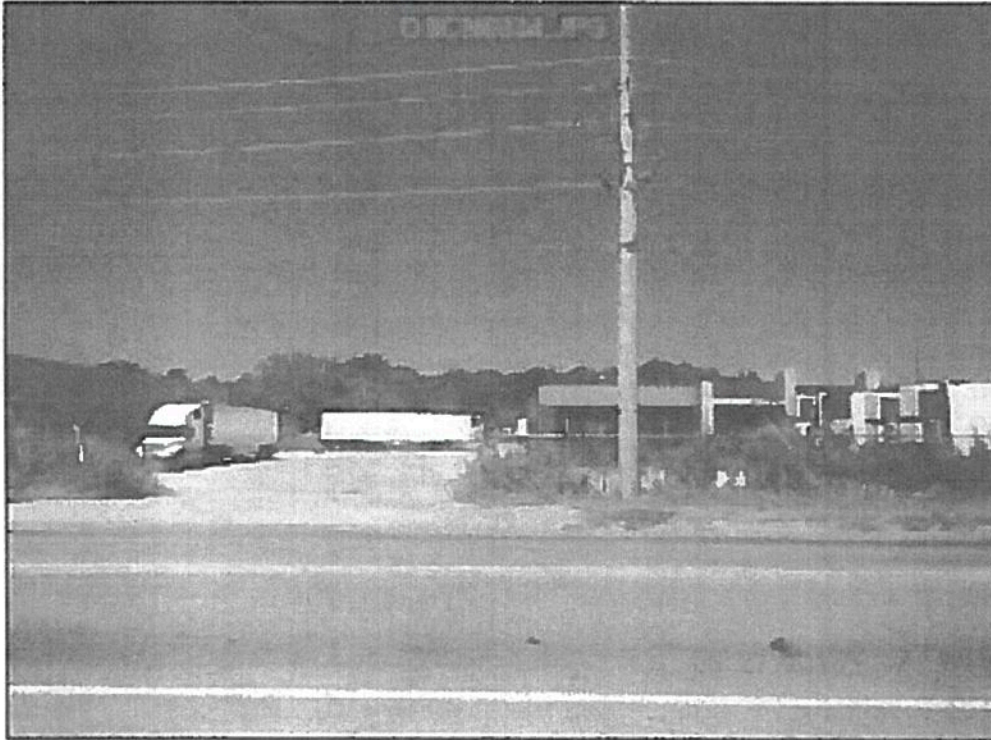
Title:



DSCN0334.JPG

Area across the streeting being used by Pilgrim's Pride, but not included in SWPPP.

Title:



DSCN0338.JPG

Outfall 1 where sample is collected (not discharging at time of photo).

Title:



DSCN0339.JPG

Outfall 002

Title:



DSCN0340.JPG

Outfall 002 discharging despite the lack of rain.

Title:





410 Sunset Blvd, West Columbia, SC 29169

Off Market Beds Baths
\$1,512,730 2 1

Directions

View on



Redfin



Zillow

410 Sunset Blvd, West Columbia, SC 29169 | Zillow

<https://www.zillow.com/homedetails/410-Sunset-Blvd...>

410 Sunset Blvd , West Columbia, SC 29169-7342 is currently not for sale. The sq. ft. single-family home is a 2 bed, 1.0 bath property. This home was built in and last sold on 10/7/2008 for \$1,512,730. View more property details, sales history and Zestimate data on Zillow.

Location: 410 Sunset BlvdWest Columbia, SC...

Columbia Farms Inc 410 Sunset Blvd West Columbia, SC ...

<https://www.mapquest.com/us/south-carolina/columbia-farms-inc-408993186>

410 Sunset Blvd West Columbia SC 29169. Reviews (803) 794-8440 Website. Menu & Reservations

Make Reservations . Order Online Tickets Tickets See Availability Directions

{{::location.tagLine.value.text}} Sponsored Topics. Legal. Help Get directions, reviews and information for Columbia Farms Inc in West Columbia, SC. ...

Images of 410 Sunset Boulevard West Columbia 29169

bing.com/images



See more images of 410 Sunset Boulevard West Columbia 29169

112,000 Results

Any time ▾

410 Sunset Blvd, West Columbia, SC 29169

House

Nearby schools include Islamic Academy of Columbia, Colonial Christian Academy and Brookland-Cayce Senior High School. The closest grocery stores are Golden Asian Grocery, BI-LO and Publix Super... [redfin.com](#)

Lot: 7,841 sq feet

Type: Unknown

Nearby schools

Name and rating	Grades	Distance
4 Cyril B. Busbee Creative Arts Academy	6-8	3 mi
4 Saluda River Academy For The Arts	K-5	1.80 mi
4 Brookland-Cayce Senior High School	9-12	0.90 mi

GreatSchools rating out of 10

Data from: Zillow · Redfin · GreatSchools

[Suggest an edit](#)

House Of Reaeford 410 Sunset Blvd West Columbia, SC ...

<https://www.mapquest.com/us/south-carolina/house-of-reaeford-424080356> ▼

Get directions, reviews and information for House Of Reaeford in West Columbia, SC. ... 410 Sunset Blvd West Columbia SC 29169. Reviews (803) 794-8440. Menu & Reservations Make Reservations . Order Online Tickets Tickets See Availability Directions ...

Location: 410 Sunset Blvd, West Columbia, 2... **Phone:** (803) 794-8440

410 Sunset Blvd, West Columbia, SC 29169 | Redfin

<https://www.redfin.com/SC/West-Columbia/410-Sunset-Blvd-29169/home/86829145> ▼

2 beds, 1 bath property located at 410 Sunset Blvd, West Columbia, SC 29169. View sales history, tax history, home value estimates, and overhead views. APN 00466002007.

Location: 134 Heises Pond Way, Columbia, 2...

Poultry Processing Plants - MapQuest

<https://www.mapquest.com/search/results?query...> ▼

410 Sunset Blvd , West Columbia, SC 29169 House Of Reaeford 410 Sunset Blvd , West Columbia, SC 29169 House Of Raeford Farms Inc 441 Sunset Blvd , West Columbia, SC 29169 Pilgrim's Pride Corp 2920 Starks Ferry Rd , Sumter, SC 29154 Gold Kist Inc 2050 Highway 15 S , ...

Columbia Farms 410 Sunset Blvd, West Columbia, SC 29169 ...

<https://www.yellowpages.com/west-columbia-sc/mip/columbia-farms-10805640> ▼

Get reviews, hours, directions, coupons and more for Columbia Farms at 410 Sunset Blvd, West Columbia, SC 29169. Search for other Farms in West Columbia on The Real Yellow Pages®. Browse

Location: 410 Sunset Blvd, West Columbia, 2... **Phone:** (803) 794-8440

Poultry Farms - MapQuest

<https://www.mapquest.com/search/results?query...> ▼

441 Sunset Blvd , West Columbia, SC 29169 Columbia Farms Inc 410 Sunset Blvd , West Columbia, SC 29169 Trinity Poultry Farm 4356 Salley Rd , Salley, SC 29137 Kingfisher Poultry Farms 255 Belfast Ave , Holly Hill, SC 29059 Southern States Co-Op 335 Broad St ,

House Of Raeford Farms Inc 441 Sunset Blvd, West Columbia ...

<https://www.yellowpages.com/west-columbia-sc/mip/...> ▼

Get reviews, hours, directions, coupons and more for House Of Raeford Farms Inc. Search for other Farms on The Real Yellow Pages®. Get reviews, hours, directions, coupons and more for House Of Raeford Farms Inc at 441 Sunset Blvd, West Columbia, SC 29169.

Location: 441 Sunset Blvd, West Columbia, 2... **Phone:** (803) 794-8440

West Columbia, South Carolina (SC 29169) profile ...

www.city-data.com/city/West-Columbia-South-Carolina.html ▼

West Columbia: Brookland Baptist Church in West Columbia, South Carolina, is at 1066 Sunset Boulevard. West Columbia used to be called New Brookland, and this church (though not the building) is older than the name change. The largely African-American church ...

Location: Lexington County

1635 Sunset Blvd, West Columbia, SC 29169 - realtor.com®

https://www.realtor.com/.../1635-Sunset-Blvd_West-Columbia_SC_29169_M51696-49097 ▼

View 15 photos for 1635 Sunset Blvd, West Columbia, SC 29169 a 4 bed, 2 bath, 2,425 Sq. Ft. single family home built in .

Related searches for 410 sunset boulevard west columbia 29169

little caesars west columbia 29169

sunrise sunset columbia **sc**

homes for sale 29169

west boulevard **elementary** columbia **mo**

columbia **sc** sunset

1

2

3

4

5

>